

**Appendix F**  
**Draft Land Use Plan Amendments**

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## Acronyms and Abbreviations

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
BMP	best management practice
CA	Conservation Agreement
CFR	Code of Federal Regulations
DEIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
EPM	environmental protection measure
FEIS	Final Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act of 1976
Gateway West	Gateway West Transmission Line Project
kV	kilovolt
LUP	land use management plan
MEP	Mitigation and Enhancement Portfolio
MFP	Management Framework Plan
MP	milepost
NCA	National Conservation Area
NEPA	National Environmental Policy Act
NHT	National Historic Trail
NOI	Notice of Intent
Project	Gateway West Transmission Line Project
RMP	Resource Management Plan
ROW	right-of-way
SEIS	Supplemental Environmental Impact Statement
SRBOP	Morley Nelson Snake River Birds of Prey National Conservation Area
SRMA	Special Recreation Management Area
TES	threatened, endangered, and sensitive
VRM	Visual Resource Management
WECC	Western Electricity Coordinating Council
WSR	Wild and Scenic River
WWE	West-wide Energy

# 1 Introduction

In April 2013, the Bureau of Land Management (BLM) published the Final Environmental Impact Statement (FEIS) for the Gateway West Transmission Line Project (Gateway West or Project), starting in Wyoming at the Windstar Substation and ending at the Hemingway Substation. In the Record of Decision, published in November 2013, the BLM deferred offering a Right-of-Way (ROW) Grant for Segments 8 and 9 to allow additional time for federal, state, and local permitting agencies to examine additional routing options and mitigation and enhancement measures for these segments (see Chapter 1 of the Supplemental Environmental Impact Statement [SEIS]).

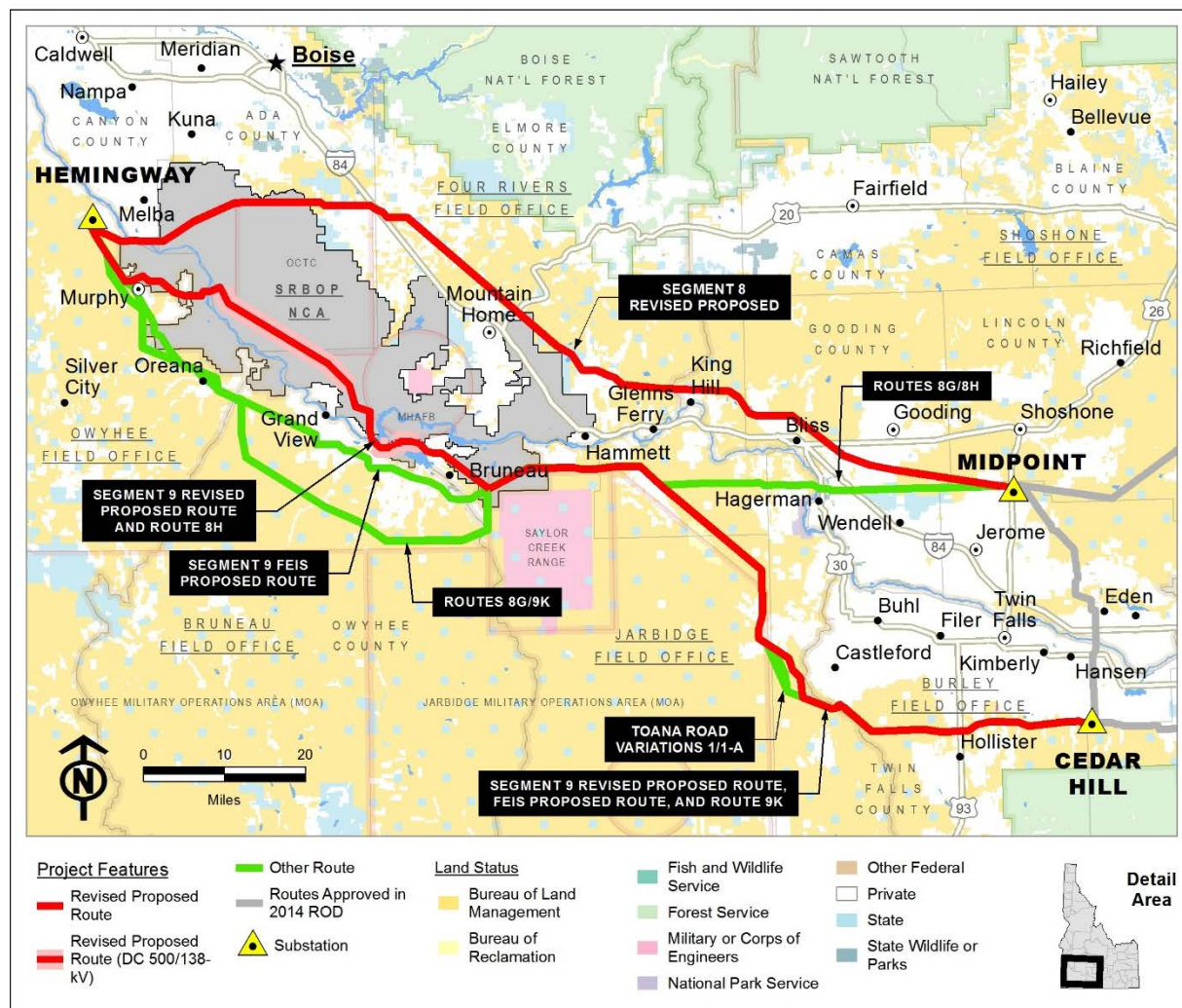
The Proponents submitted a revised Project application for Segments 8 and 9 in August 2014 (Figure 1-1). The Proponents have also submitted a draft Mitigation and Enhancement Portfolio (MEP) to the BLM, which contains proposed mitigation, including compensatory mitigation, and other measures intended to enhance resources and values found in the SRBOP. The Segments 8 and 9 Revised Proposed Routes as currently proposed by the Proponents would require the amendment of BLM land use plans (i.e., resource management plans [RMPs] or management framework plans [MFPs]). The Segment 8 Revised Proposed Route would require one or more amendments to the Bennett Hills/Timmerman Hills MFP, the 1987 Jarbidge RMP,<sup>1</sup> the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) RMP, and the Kuna MFP. The Segment 9 Revised Proposed Route would require amendments to the Twin Falls MFP, the 1987 Jarbidge RMP, and the SRBOP RMP. The BLM developed two Route Variations to the Segment 9 Revised Proposed Route to avoid the Toana Freight Wagon Road, a National Register Historic site. Toana Road Variation 1 and Toana Road Variation 1-A would both cross the Jarbidge Planning area managed under the 2015 Jarbidge RMP. No amendment would be needed.

Additional routing options, 8G and 9K, were developed by the BLM to avoid the SRBOP (Figure 1-1) to the extent feasible. These alignments closely follow Segment 8 and 9 routes that were analyzed in the FEIS, although in slightly different locations. The BLM also developed a combination route (8H) that includes the eastern portion of 8G (through the Monument and Jarbidge Field Offices) and the western portion of the Revised Proposed Route for Segment 9 (through the SRBOP). This route was developed for Alternatives 6 and 7, which use the FEIS Proposed Route and Route 9K, respectively, for the Segment 9 routing. There are a few areas where the routes follow new routing and, for some Alternatives, the alignments of Segment 8 routes (8G or 8H) and Segment 9 Routes (9K, FEIS Proposed 9) parallel each other with a 250-foot separation from just south of Glens Ferry (Route 8G MP 44 and Route 9K MP 72.7) to the Hemingway Substation. This parallel routing crosses the SRBOP for approximately 10 miles just northwest of the Saylor Creek Range; the remainder of the parallel alignment avoids the SRBOP. Route 8G would require amendments to the SRBOP

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<sup>1</sup> A new RMP for the Jarbidge Field Office was signed in September 2015. This RMP covers land within the current Field Office boundary, but not those areas that were covered in the 1987 RMP but are now in the Boise and Four Rivers Field Offices. No amendments are needed where the Project crosses the current Jarbidge Field Office boundaries.

RMP and the Bruneau RMP. Route 9K would require amendments to the Twin Falls MFP, the Bruneau RMP, and the SRBOP RMP. FEIS Proposed 9 would require amendments to the Twin Falls MFP, SRBOP RMP, and Bruneau MFP. See Chapter 2 of the SEIS for full route descriptions of the Alternatives.



**Figure F-1.** Project Overview

Approval of a project-specific proposal that is not in conformance with the existing land use plan requires that a land use plan amendment be completed (BLM Land Use Planning Handbook H-1601-1<sup>2</sup>). Any decisions to amend a plan would be made concurrent with a decision on the Project. Amendments to the BLM RMPs and MFPs are summarized for each alternative in Table 2.3-1 of the SEIS (see Chapter 2 for more details). This document, Appendix F to the SEIS, includes a comparison of effects for each of the plan amendments required for all alternatives considered in detail in the SEIS.

<sup>2</sup> BLM. 2005. Land Use Planning Handbook. BLM Handbook H-1601-1. U.S. Department of Interior. March 11.

## 2 Planning Process

The planning action is to consider amending six BLM land use management plans (LUPs) as a part of the SEIS. This action is being considered under the BLM 1600 manual guidance (BLM Land Use Planning Handbook H-1601-1), and the planning regulations published as Title 43 Code of Federal Regulations (CFR) (including 1610.5-5, Amendments). This process is discussed in more detail in Chapter 2 of the Draft SEIS. Some of the LUPs crossed by the Project were approved in the 1970s and 1980s. As land use management needs and conditions change, the amendment process allows the BLM to amend plans to meet current needs when such actions are warranted. The process requires analysis of effects of these amendments, which is provided here (Appendix F) and in Appendix G (for additional analysis of visual impacts).

Scoping meetings were held for this Project in the fall of 2014. The public, as well as state, local, and tribal governments and federal agencies, was invited to participate in the planning process. Public scoping was initiated with the publication of a Notice of Intent (NOI) to prepare an SEIS in the Federal Register on September 19, 2014 (79 *Federal Register* 56399). The NOI was followed by a series of four public meetings held in October 2014. The public has been given the opportunity to comment on and provide additional information regarding the Project, including the possibility of BLM Plan amendments, during these meetings. The BLM is reviewing the effects of Project implementation through seven route combinations, referred to as Alternatives. Two Co-Preferred Alternatives (Alternative 2 and Alternative 5) were selected. Co-Preferred Alternative 2 includes the Revised Proposed Route for Segment 8 and the FEIS Proposed 9. Co-Preferred Alternative 5 includes Routes 8G and 9K. Proposed Amendments are those needed for the Co-Preferred Alternatives. The amendments considered for the Revised Proposed Routes and other routes were developed over the course of the SEIS process and consider planning requirements for the routes incorporated within each Alternative.

During the Draft Environmental Impact Statement (DEIS) process, a report (Land Use Plan Consistency Analysis, 2010) was compiled to document compliance with the 20 federal land use plans that provide direction for federal lands crossed by the Proposed Action or Action Alternatives for the Gateway West Project. This report was included as Appendix F in the Administrative Draft EIS submitted to the BLM and U.S. Department of Agriculture, Forest Service for review on March 15, 2010. From that analysis, needs for potential amendments were identified and analyzed based on planning issues and criteria. Amendments were proposed for the BLM-Preferred Route in the FEIS. The proposed amendments, and amendments that would be needed for other alternatives, were developed and presented in the FEIS and Appendices (see FEIS Appendices F-1 and F-2 for amendment language and analysis for the BLM-Preferred and Alternative Routes). These amendments were reviewed for the SEIS to determine which, if any, still applied and if additional amendments would be needed for the Revised Proposed Routes. The following sections address identified amendments that would be needed for the Segments 8 and 9 Revised Proposed Routes and additional Routes 8G, 8H, FEIS Proposed 9, and 9K.

## **2.1 Planning Issues and Criteria**

The NOI listed the planning issues the BLM anticipated and invited the public, other federal agencies, as well as state, local, and Tribal governments to identify additional concerns or issues during scoping meetings and the comment period that followed.

### **2.1.1 Planning Issues**

The following issues were brought up by the public during the DEIS public scoping (Tetra Tech 2009) and comment period, were raised by federal and state agencies during scoping and agency discussions, or must be considered as stipulated by law or regulation:

- Objection to location on private lands (“If the project is for the general public good, it should be on public lands”);
- Reliability and proposed separation distances of transmission lines;
- Avoiding sensitive areas such as National Monuments and Wildlife Refuges, military operating areas, National Conservation Areas (NCAs), Areas of Critical Environmental Concern (ACECs), Wild and Scenic Rivers (WSR), and State Parks;
- Effects to Native American traditional cultural properties and respected places;
- Effects to paleontological resources;
- Effects on wildlife habitat, plants, and animals including threatened, endangered, and sensitive (TES) species;
- Effects to visual resources and existing viewsheds;
- Effects to National Historic Trails (NHTs) and their viewsheds;
- Effects to recreation resources;
- Land use conflicts and consistency with land use plans;
- Effects to soils and water from surface-disturbing activities;
- Effects to agriculture lands;
- Effect on local and regional socioeconomic conditions; and
- Management of invasive plant species and effective reclamation.

We reviewed the scoping comments received for this SEIS and determined that planning issues considered in the FEIS have not changed.

### **2.1.2 Planning Criteria**

The following general planning criteria are being considered in the development of the proposed plan amendments:

- National Environmental Policy Act (NEPA);
- Existing laws, regulations, and BLM policies;
- Plans, programs and policies of other federal, state and local governments, and Indian Tribes;

- Public input;
- Future needs and demands for existing or potential resource commodities and values;
- Past and present use of public and adjacent lands;
- Environmental impacts;
- Social and economic values;
- Public welfare and safety; and
- President's National Energy Policy.

### **3 Draft Amendments**

Amendments to the BLM's management plans would be needed to bring the Project into compliance with the applicable RMPs and MFPs for BLM-managed lands crossed by the Project. Instances where the Project may not be in conformance with applicable RMPs and MFPs include:

- Developing a new ROW outside of approved corridors,
- Crossing NHTs,
- Crossing ACECs,
- Allowing construction within 0.5 mile of sensitive plant habitat,
- Changing management in Special Recreation Management Areas (SRMA), and
- Changing Visual Resource Management (VRM) classifications

Effects on visual resources were determined through the use of computer modeling, field visits, and site-specific knowledge by local BLM staff. The analysis and effects determinations on visual resources are documented in Appendix G. These draft amendments reference the analysis, maps of the locations (referred to as areas of inconsistency), photographs, and simulations included in Appendix E and Appendix G. The visual analysis pertains only to the public lands, as the BLM does not establish visual management objectives for lands it does not manage.

#### **3.1 Twin Falls MFP Draft Amendments**

Actions that occur on lands managed by the Burley Field Office within the Twin Falls MFP Planning Area, including the granting of ROW under Title V of the Federal Land Policy and Management Act of 1976 (FLPMA) and VRM Class management, are guided by decisions recorded in the Twin Falls MFP approved in 1982, and in the 1989 Salmon Falls Creek ACEC designation amendment. The MFP<sup>3</sup> does not permit powerlines to the east or west of the two established corridors and designates land that would be crossed by the 500-kilovolt (kV) transmission line as VRM Classes I and II. The 1989 amendment restricts activities within the designated Salmon Falls Creek ACEC. The

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<sup>3</sup> BLM. 1982. Twin Falls Management Framework Plan. BLM Burley Field Office, U.S. Department of Interior.



ACEC also includes a portion of Salmon Falls Creek that has been determined to be eligible for WSR status.

Although scenery is one of the river's outstanding remarkable values, the crossing point currently includes an existing single-phase, low-voltage distribution line and a paved road and bridge—the Lilly Grade Road. The towers would be located outside the WSR corridor (generally 0.25 mile wide). Only the transmission lines would cross the WSR eligible segment.

Section 2(b) of the WSR Act specifies the following:

*Recreational River Areas: Recreational river areas are those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along the shorelines, and that may have undergone some impoundment or diversion in the past.*

Therefore, a transmission line crossing this portion of this eligible WSR segment would not affect the river's suitability as a Recreation River.

The Segment 9 Revised Proposed Route, FEIS Proposed 9, and Route 9K would cross through areas managed by the Twin Falls MFP in the same alignment as the 2013 FEIS Preferred Route. The alignment was selected to comply with Western Electricity Coordinating Council (WECC) requirements and to protect significant resources to the greatest extent feasible. These include, but are not limited to, TES species, sensitive lands, cultural resources, and visual resources. The Project would not conform to the Twin Falls MFP; therefore, land use plan amendments would be needed. Both Segment 9 routes for the Co-Preferred Alternatives, FEIS Proposed 9 (Alternative 2) and Route 9K (Alternative 5), follow the same alignment through this area. The remaining Segment 9 routes also share this alignment. Table F-1 lists the draft amendments for the Twin Falls MFP. Since the Segment 9 routes for all Alternatives follow the same alignment in this area, there are no separate amendments that are not also needed for the Co-Preferred Alternatives.

**Table F-1.** Draft Amendments for the Twin Falls MFP

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
<b>Co-Preferred Alternative 2</b> <b>Co-Preferred Alternative 5</b> Alternative 1 Alternative 3 Alternative 4 Alternative 6 Alternative 7	SEIS-1	Revised Proposed 9/ 9K/FEIS Proposed 9	L-4.1 Allow future major power transmission lines (line of at least 46-138 kV which originate and terminate outside of the MFP area) to be constructed within the recommended corridors. Also allow construction of transmission lines between the corridors. Do not permit power lines to the west or the east of the two corridors. Exempt service lines from restriction.	Allow a 500-kV transmission line ROW outside of existing corridors.

**Table F-1.** Draft Amendments for the Twin Falls MFP (continued)

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
<b>Co-Preferred Alternative 2</b> <b>Co-Preferred Alternative 5</b> Alternative 1 Alternative 3 Alternative 4 Alternative 6 Alternative 7	SEIS-2	Revised Proposed 9/ 9K/FEIS Proposed 9	VRM I – VRM 1.1 Manage Salmon Falls Canyon between the Salmon Falls Dam and Lilly Grade for natural ecological change in accordance with a VRM Class I designation. This designation would include only the area from rim to rim. Manage the canyon from Lilly Grade to Balanced Rock under a VRM Class II designation. 2. The ACEC is subject to the following resource restrictions....(2) avoid utility rights-of-way....management of the Salmon Falls ACEC in the Twin Falls Resource Area will be the same as in the Jarbidge Resource Area	The VRM Class I and II areas adjacent to the Roseworth Corridor (established by the 2015 Jarbidge RMP) will be reclassified to match the VRM classes in the Jarbidge RMP.  Allow a 500-kV transmission line to cross Salmon Falls canyon through the ACEC, consistent with the corridor

The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan. Explanations and evaluations of the effects of selecting the route through areas managed by the Twin Falls MFP are provided in Appendix F-1 of the FEIS, Section 3.7. An abbreviated version is provided below.

### 3.1.1 Purpose and Need to Amend the Twin Falls MFP

The Twin Falls MFP restricts future major power transmission lines to the corridors designated in the MFP. Connecting lines between these corridors are permitted, however major powerlines to the east and west are not. Routing for Segment 9 in all Alternatives for the Gateway West Project would not be within the designated corridors and would cross the MFP from east to west.

Routing for Segment 9 in all Alternatives for the Gateway West Project would cross the Salmon Falls Creek ACEC. The Twin Falls MFP contains direction for managing visual resources that would restrict powerline construction, including direction to manage the Salmon Falls Canyon as VRM Class I between Salmon Falls Dam and Lilly Grade, and VRM Class II between Lilly Grade and Balanced Rock. The Twin Falls MFP Amendment in 1989 designating the Salmon Falls Creek ACEC prohibits the utilities from crossing of the Salmon Falls Creek ACEC. The 1989 Plan Amendment to the Twin Falls MFP regarding the establishment of the Salmon Falls Creek ACEC states the following:

“2. The ACEC is subject to the following resource management restrictions: (1) exclude livestock grazing, (2) avoid all utility rights-of-way, (3) close to agricultural entry, (4) close to all motorized vehicle use, and (5) prohibit mechanized fire suppression equipment.”

The 1989 amendment also states that management of the Salmon Falls Creek ACEC in the Twin Falls Resource Area would be the same as for the Jarbidge Resource Area.

The purpose of the draft amendments is to modify the MFP visual resource management designations and ACEC restrictions such that the Project would be in conformance with the revised Twin Falls MFP.

### **3.1.2 Project Alternatives and Associated Routing**

The Segment 9 Revised Proposed Route, Route 9K, and FEIS Proposed 9 follow the same alignment through areas managed under the Twin Falls MFP. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Twin Falls MFP.

**Segment 9 Revised Proposed Route:** Segment 9 of the Revised Proposed Route (Alternative 1) enters lands managed by the Twin Falls MFP west of Cedar Hill. The route proceeds in a westerly direction and then turns north, paralleling Salmon Falls Creek, which the route would cross as it leaves the Twin Falls Planning Area. Segment 9 would cross the Salmon Falls Creek ACEC where the creek is designated a Recreation segment of the eligible WSR.

#### **Additional Routes:**

*Route 9K (Co-Preferred Alternative 5 and Alternatives 3 and 7)* follows the same alignment through the Twin Falls MFP Planning Area as the Segment 9 Revised Proposed Route and would therefore cross the same areas as described for the Revised Proposed Route.

*FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6)* follows the same alignment through the Twin Falls MFP Planning Area as the Segment 9 Revised Proposed Route and would therefore cross the same areas as described for the Revised Proposed Route.

**No Action Alternative:** The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed; therefore, no associated plan amendments would be required.

The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

### **3.1.3 Amendments to the Twin Falls MFP Associated with the Co-Preferred Alternatives**

Both Co-Preferred Alternatives would include routing for Segment 9 that would follow the same alignment through the Twin Falls MFP Planning Area. The Segment 9 Revised Proposed Route, FEIS Proposed 9 (Co-Preferred Alternative 2), and Route 9K (Co-Preferred Alternative 5) would all require a plan amendment to the Twin Falls MFP for granting of a ROW for the Project across lands managed by the Burley Field Office. Amendments are proposed for FEIS Proposed 9 and Route 9K for Co-Preferred

Alternatives 2 (Figure F-2a) and 5 (Figure F-2b), respectively. The Twin Falls MFP allows new utilities to be constructed within and between existing corridors and protects visual resources adjacent to Salmon Falls Creek. These MFP decisions would be rewritten to allow development of this Project.

**Draft Amendment SEIS-1** for the Segment 9 Revised Proposed Route would rewrite the “Land 4.1” decision to allow the development of this Project (changes in italics):

“Allow future major power transmission lines (line of at least 46-138 kV which originate and terminate outside of the MFP area) to be constructed within the recommended corridors. Also allow construction of transmission lines between the corridors. Do not permit power lines to the west or the east of the two corridors. *Allow a 500-kV transmission line ROW outside existing corridors.* Exempt service lines from restriction.”

The Segment 9 Revised Proposed Route would require an amendment to the Twin Falls MFP VRM classification and Amendment (1989) regarding the establishment of the Salmon Falls Creek ACEC.

**Draft Amendment SEIS-2** for the Segment 9 Revised Proposed Route would amend the VRM direction:

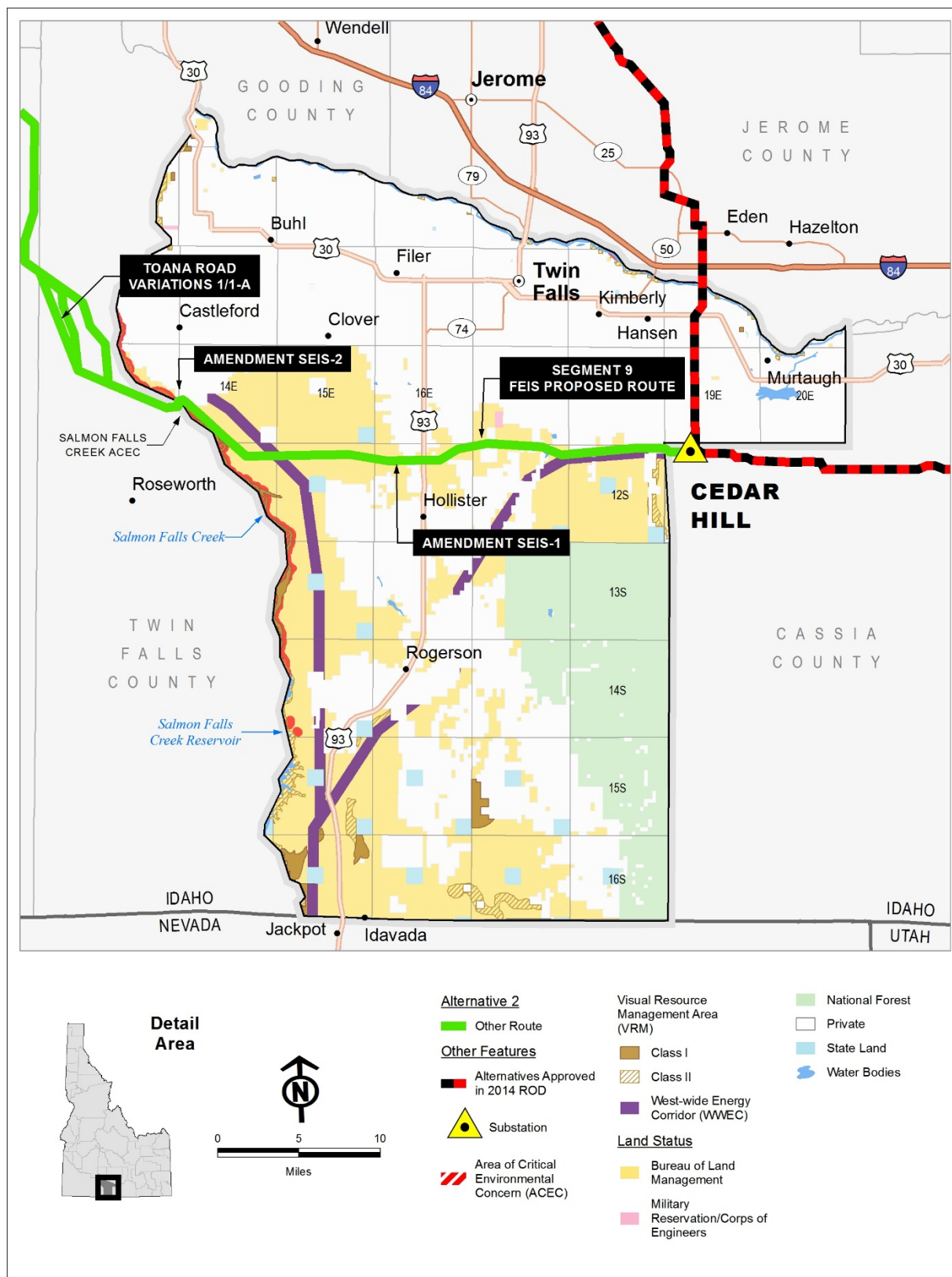
*“The VRM Class I and II areas adjacent to the Roseworth Corridor (established by the 2015 Jarbidge RMP) will be reclassified to match the VRM classes in the Jarbidge RMP.”*

Amendment SEIS-2 would also amend the Twin Falls MFP and 1989 Plan Amendment regarding the management of the Salmon Falls Creek ACEC:

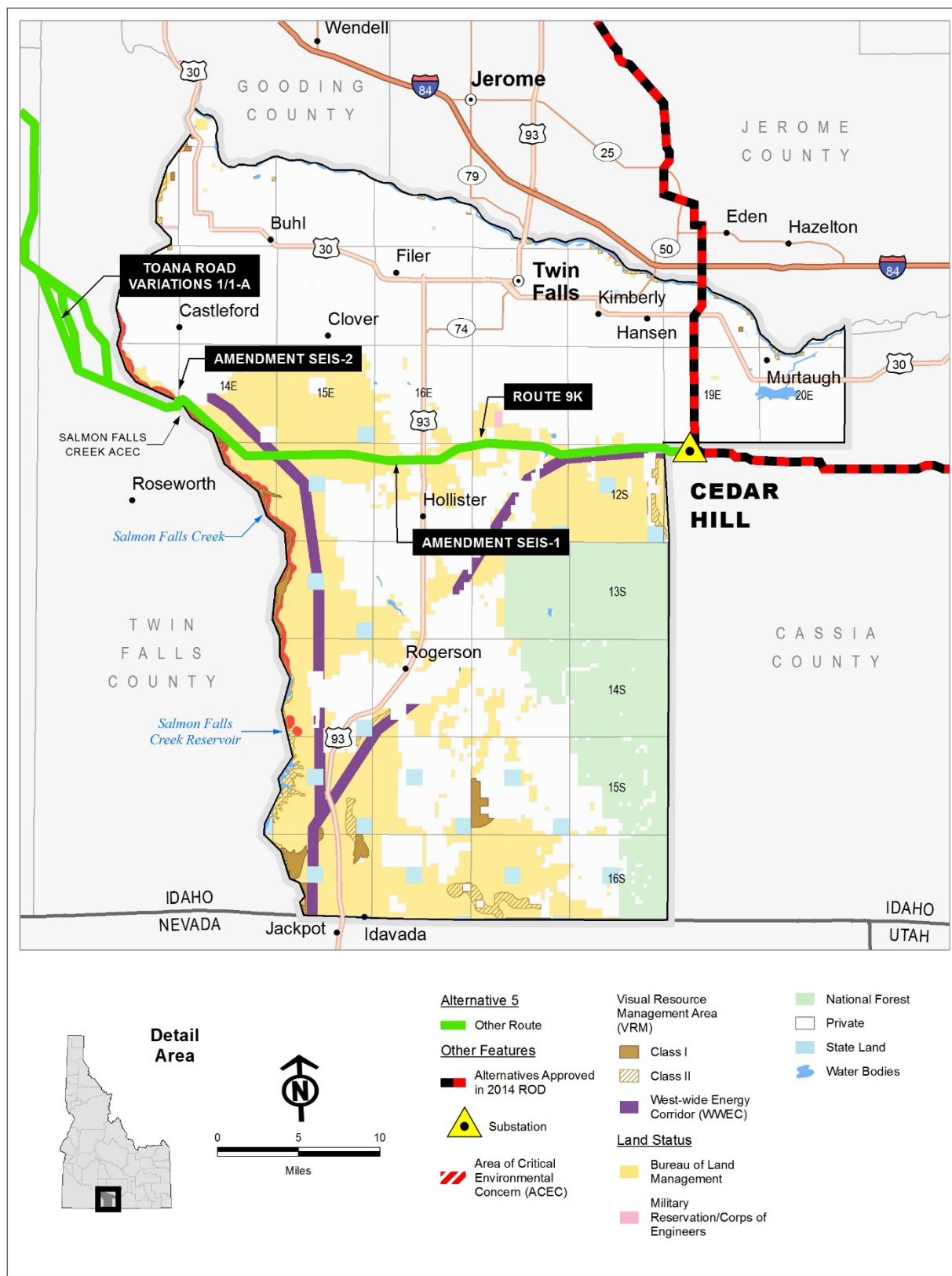
*“Allow a 500-kV Transmission Line Project to cross Salmon Falls canyon through the ACEC, consistent with the corridor established in the 2015 Jarbidge RMP.”*

### **3.1.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives**

There are no additional amendments for routes that are not included in the Co-Preferred Alternatives. All routing that does not conform to the Twin Falls MFP follows the same alignment for all Alternatives. Therefore, amendment needs for the other Alternatives are the same as for the Co-Preferred Alternatives.



**Figure F-2a.** Location of Twin Falls MFP Amendments for Co-Preferred Alternative 2



**Figure F-2b.** Location of Twin Falls MFP Amendments for Co-Preferred Alternative 5

### **3.1.5 Affected Environment and Environmental Effects**

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 and Appendix G for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 and 3.10.2.3 for effects on wildlife; Sections 3.11.2.2 and 3.11.2.3 for effects on special status species; and Sections 3.17.2.2 and 3.17.2.3 for effects on land use and recreation.

Allowing the transmission line to cross outside of the designated corridors will extend the impacts of transmission lines in an east-west direction. The rationale for the existing decision is that “utility corridors serve to accommodate major powerlines in a designated route which minimizes environmental construction and provides a feasible, economical route for power transmission.” There is concern about major transmission lines causing serious adverse environmental impacts in the Foothills area, the Shoshone Basin, and along Salmon Falls Creek. Environmental protection measures (EPMs) such as OM-21 through OM-23 will monitor occurrence of sensitive plant and animal species within the ROW and provide actions to modify project actions as agreed to with Agency personnel.

Changing the VRM classification adjacent to Salmon Falls Creek and allowing a major powerline to cross the ACEC where the Roseworth corridor exists on the west side of the canyon (within the Jarbidge Field Office) would be consistent to the intent of the 1989 amendment to manage both sides of the ACEC in a similar fashion; however, it would not be consistent with the direction in the 1989 amendment restricting overhead structure crossings and directing the management to be consistent with the Jarbidge RMP that was then in effect. This amendment would lower the protection within the area similar to the area covered by the Roseworth Corridor west of Salmon Falls Creek and, in addition to Amendment SEIS-1, could make it more likely that a similar corridor could be established in the Twin Falls RMP Planning Area under future management actions.

While the proposed crossing of Salmon Falls Creek would occur on a WSR-eligible segment, the crossing would be in the Recreational segment and would not detract from its WSR eligibility status. See the discussion under the Twin Falls MFP.

#### **3.1.5.1 Effects of Amendments for Routes Associated with the Co-Preferred Alternatives**

The Revised Proposed Route in Segment 9 crosses the Twin Falls MFP Planning Area in an east-west direction. The east-west route crosses mule deer range and near raptor nests. The transmission line construction and operation would impact vegetation and soils as well as wildlife. Impacts include soil compaction and erosion, potential weed spread and introduction, removal of native vegetation, disturbance to wildlife due to habitat fragmentation, behavioral avoidance of structures and roads, and dust and noise disturbance disrupting breeding and rearing. Best management practices (BMPs) and

EPMs such as WILD-2 (which restricts vehicular speeds and locations on project roads), VEG-1 (minimizing native plant disturbance), as well as SOIL and WQA EPMs will reduce impacts to these resources.

Changing the VRM Class II designated land north of Lilly Grade would result in a disruption of the view of the adjacent landscape. Views from the canyon and approaching the canyon where the transmission line would cross would be interrupted by towers and cables (see Appendix G for visual analysis). EPMs such as using dull galvanized finish on lattice steel towers (VIS-1), using non-reflective finishes on subconductors and insulators (VIS-2 and VIS-9), as well as siting towers and access roads to reduce visual impacts (VIS-5 through VIS-8 and VIS-11) will be used to reduce visual impacts.

An amendment allowing the crossing of the ACEC would retain the restrictions for future utility crossings of the Salmon Falls Creek canyon. Surface disturbance EPMs, such as SOIL-4, vegetation EPMs such as VEG-1 and VEG-4, and wildlife EPMs such as WILD-3, will aim to minimize impacts to the resources in the area. While these EPMs would reduce impacts, crossing Salmon Falls Creek within the ACEC would not meet the MFP direction of protecting the area from utilities and road development. Co-locating the transmission line crossing with the existing smaller transmission line and where a road already crosses the canyon would reduce the impact of a new disturbance to the area; however, it would also place these large structures along a commonly used travel path where they would be easily observed by visitors to the area, increasing their visual impact.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the 2013 FEIS.

### **3.1.5.2 Effects of Amendments for Routes Not Associated with the Co-Preferred Alternatives**

The Segment 9 routes for all Alternatives follows the same alignment as used for the Co-Preferred Alternatives. Therefore, effects for all Alternatives would be the same as described for the Co-Preferred Alternatives

## **3.2 1987 Jarbidge RMP Draft Amendments**

Actions that occur on lands managed by the Jarbidge Field Office are guided by decisions recorded in the Jarbidge RMP, approved in 2015. Actions occurring on portions of lands managed under the Four Rivers Field Office, including the granting of ROW under Title V of FLPMA, are guided by decisions recorded in the Jarbidge RMP approved on March 23, 1987.<sup>4</sup> The RMP designates utility avoidance/restricted areas for cultural features, designates VRM classes, and protects cultural resources. The proposed Project would not conform to requirements in the 1987 Jarbidge RMP.

In the 2013 FEIS, amendments were proposed for the Segment 9 Proposed Route, which is unchanged in the SEIS through the majority of the Jarbidge Field Office.

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<sup>4</sup> BLM. 1987. Jarbidge Resource Management Plan. BLM Jarbidge Field Office, U.S. Department of Interior.



Additionally, amendments were proposed for Alternatives 8A and 9B which are in similar locations for Route 8G. Amendments for these routes included allowing the project to cross the Salmon Falls Creek ACEC, changing VRM Class II areas to Class IV, and allowing the project to cross historic trails. The 2015 RMP designates a utility corridor through the ACEC, reclassifies the VRM, and provides language permitting crossing historic trails and their viewsheds, provided proper procedures are followed. This resulted in these amendments no longer being necessary.

The Revised Proposed Route for Segment 8, which is used in Co-Preferred Alternative 2, would cross area that is not covered by the 2015 Jarbidge RMP and still managed under the 1987 Jarbidge RMP. The Project would not be in conformance with management direction of this RMP in some areas and amendments would be required (see Table F-2a). The Revised Proposed Route for Segment 9 and Route 8H follow the same alignment through the western portion of the Jarbidge area and cross land currently still managed under the 1987 Jarbidge RMP just east of the SRBOP. A small portion of VRM Class II land is crossed and an amendment would be needed if an action alternative containing one of these routes (Alternative 1, 6, or 7) is selected (see Table F-2b).

**Table F-2a.** Draft Amendments for the 1987 Jarbidge RMP

Affected Alternatives	Number	Affected Route	Existing RMP Direction	Draft Amendment
<b>Co-Preferred Alternative 2</b> Alternative 1 Alternative 3	SEIS-3	Revised Proposed 8	MUA-3 Utility avoidance/restricted area – three paleontological areas (Sugar Bowl, Glenn's Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5 miles) to overhead and surface disturbance and underground utilities.	The current Lands decision is amended to reclassify the area identified as restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way while protecting the Oregon Trail ruts.
<b>Co-Preferred Alternative 2</b> Alternative 1 Alternative 3	SEIS-4	Revised Proposed 8	Cultural Resources – The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor through which these routes pass.	The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor of ruts except where visual impacts are already compromised. Protect existing trail ruts from surface disturbance

**Table F-2b.** Amendments for the 1987 Jarbidge RMP for Non-Preferred Alternatives

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
<b>Co-Preferred Alternative 2</b> Alternative 1 Alternative 3	SEIS-5	Revised Proposed 8	Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9.	The VRM decisions and Map 9 are amended to accommodate a major powerline R/W. These VRM boundaries are modified according to the new manual to reclassify the VRM Class I area associated with Oregon Trail and the Proposed 500-kV line as VRM Class IV
Alternative 1 Alternative 6 Alternative 7	SEIS-14	Segment 9 Revised Proposed Route/8H	Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9.	The VRM decisions and Map 9 are amended to accommodate a major powerline R/W. The VRM Classification is amended to change the VRM Class to VRM Class III, adjacent to the proposed line, where the towers would be visible and dominate the landscape

### 3.2.1 Purpose and Need to Amend the 1987 Jarbidge RMP

The Revised Proposed Routes for Segments 8 and 9, Routes 8G and 9K, FEIS Proposed 9, and the Toana Road Variations would cross through the Jarbidge Planning Area. The Revised Proposed Route for Segment 9, the Toana Road Variations, and Alternatives 8G and 9K would cross areas managed under the 2015 Jarbidge RMP. The Project would be in conformance with the 2015 Jarbidge RMP.

A small portion of the Revised Proposed Route for Segment 9 would cross land managed under the 1987 Jarbidge RMP that is managed by the Four Rivers Field Office. The Revised Proposed Route for Segment 8 crosses land managed under the 1987 Jarbidge RMP that is managed by the Four Rivers Field Office. The 1987 Jarbidge RMP includes management objectives for many resources including lands, minerals, range management, watershed, wildlife, visual, cultural, recreation, and transportation support. The RMP decisions that need to be amended relate to cultural and visual resources. The route locations for the Project were developed to comply with

WECC requirements and to protect significant resources to the greatest extent feasible. The Revised Proposed Route for Segment 8 is the same route as the BLM-Preferred Route in the FEIS. The Revised Proposed Route for Segment 9 is the same as the BLM-Preferred Route in the FEIS east of milepost (MP) 95.6, where it switches to the Alternative 9D/G alignment analyzed in the FEIS, with some modifications near C.J. Strike Reservoir.

The Project is not in conformance with the direction provided in the 1987 Jarbidge RMP; therefore, amendments to this LUP would be needed. The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan.

The Revised Proposed Route for Segment 8 (Co-Preferred Alternative 2 and Alternative 1) would cross MUA-3 where utilities are restricted. The following section is a requirement in the 1987 Jarbidge RMP for any activities conducted and/or authorized by the BLM in MUA-3:

“MUA-3 Utility avoidance/restricted area – three Paleontological areas (Sugar Bowl, Glens Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5 miles) to overhead and surface disturbance and underground utilities.” (Jarbidge RMP 11-19)

The Segments 8 (Co-Preferred Alternative 2 and Alternative 1) and 9 (Alternative 1) Revised Proposed Routes and Route 8H (Alternative 6 and 7) would cross areas managed for VRM Class I and Class II objectives. The following VRM direction under General Management Guidelines in the 1987 Jarbidge RMP applies:

“Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9.” (Jarbidge RMP 11-4)

The Segment 8 Revised Proposed Route would cross VRM Class I areas designated around the NHTs, for approximately 3.2 miles, and would not conform to the VRM objectives in this area (see Appendix G, Section 5.2.3, for the visual analysis). Amendment SEIS-8 addresses this nonconformance.

The 1987 Jarbidge RMP discusses requirements for areas listed on the National Register of Historic Places. The Segment 8 Revised Proposed Route would be within 0.5 mile of these resources. The route would cross the Oregon Trail and Kelton Road in three locations; however, only one location would be on BLM-managed land. A second crossing would be within 0.5 mile of BLM-managed land, but this management restriction for land near trails only applies where trail crossings occur on BLM-managed land. The following section is a requirement in the 1987 Jarbidge RMP for any activities conducted and/or authorized by the BLM:

“The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor through which these routes pass.” (Jarbidge RMP 11-90)

An area north of the Hagerman Fossil Beds National Monument that would be crossed by the Project was incorrectly mapped as VRM Class II in the RMP. It is actually VRM Class III.

The purpose of the draft amendments for Co-Preferred Alternative 2 is to modify 1987 Jarbidge RMP decisions regarding visual resource, utility avoidance areas, special designations, and cultural resources such that the granting of a ROW for construction of the Project would be in conformance with the Jarbidge RMP. These amendments would also apply under Alternatives 1 and 3.

The Segment 9 Revised Proposed Route would cross VRM Class II land for 0.27 mile, just east of the SRBOP boundary. An amendment would be needed under Alternatives 1, 6, and 7 for routing in 8H or the Segment 9 Revised Proposed Route to conform to the VRM designations in the 1987 RMP.

### **3.2.2 Project Alternatives and Associated Routing**

The Segments 8 and 9 Revised Proposed Routes, FEIS Proposed 9, Route 8H, Route 8G, Route 9K, and the Toana Road Variations would cross through lands managed under the 2015 Jarbidge RMP; however, only the Segments 8 and 9 Revised Proposed Routes and Route 8H would cross land still managed under the 1987 Jarbidge RMP. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Jarbidge RMP. The Revised Proposed Routes, Routes/Alternatives, and Variations are described in Chapter 2 of the SEIS, along with the FEIS routes and additional routes not considered in detail, and reasons for considering these routes.

**Revised Proposed Routes:** The Revised Proposed Routes through the 1987 Jarbidge Planning Area follow the FEIS Proposed Routes for Segments 8 and 9 for the majority of the lengths through the Planning Area.

*Segment 8:* The Segment 8 Revised Proposed Route (Alternatives 1, 2, and 3) is the same as the Proposed Route analyzed in the FEIS. It enters the 1987 Jarbidge RMP Planning Area (in the Four Rivers Field Office) west of King Hill and continues in a westerly direction where it leaves the 1987 Jarbidge RMP Planning Area east of the Hot Springs Reservoir. Segment 8 is within the Planning Area for approximately 12 miles, 6.4 of which are located on BLM-managed land.

*Segment 9:* The Segment 9 Revised Proposed Route (Alternative 1) is same as the FEIS Preferred Route. It enters the 2015 Jarbidge RMP Planning Area (within the Jarbidge Field Office) in the Salmon Falls Creek ACEC at Lilly Grade and continues for approximately 40 miles to the north-northwest inside the eastern boundary of the Planning Area and then continues west for approximately 12 miles before exiting the 2015 Jarbidge RMP Planning Area. The route then crosses the 1987 Jarbidge RMP Planning Area for approximately 3 miles before entering the SRBOP.

**Additional Routes:** While all remaining routes cross the land managed under the 2015 Jarbidge RMP, Route 8H (Alternatives 6 and 7) is the only one that crosses land still managed under the 1987 Jarbidge RMP. Routes 8G (Alternatives 4 and 5), FEIS Proposed 9 (Alternatives 2, 4, and 6), and 9K (Alternatives 5 and 7) would cross lands managed under the 2015 Jarbidge RMP. Route 9K follows the Segment 9 Revised

Proposed Route for much of its length in this area, and Route 8G enters the Planning Area from the east before paralleling 9K through the rest of the Planning Area.

*FEIS Proposed 9* follows the same alignment as the Revised Proposed Route through the majority of the Jarbidge RMP Planning Area. At the western end, this route follows the West-wide Energy (WWE) corridor through the eastern section of the SRBOP, and then follows the WWE corridor south of the SRBOP for the majority of the rest of the route.

*Route 9K* follows the same alignment as the Segment 9 Revised Proposed Route through the 2015 Jarbidge RMP Planning Area until after it leaves the Planning Area (and thus the Jarbidge Field Office) and enters the SRBOP Planning Area. Unlike the Segment 9 Revised Proposed Route, however, 9K re-enters the Jarbidge Field Office at approximately MP 98 and continues generally south for approximately 3 miles before turning west and exiting the planning area near MP 101.

*Route 8G* enters the Jarbidge RMP Planning Area near MP 24.4 just after crossing the Snake River, north of the existing 500-kV line, Lower Salmon Falls Dam, and multiple lower voltage transmission lines, and approximately 1.0 to 1.25 miles north of Hagerman Fossil Beds National Monument. From there it continues west, remaining 250 feet north of and parallel to the existing 500-kV line, within the WWE corridor on public land. Route 8G crosses areas of extensive wind energy development to the Twin Falls/Elmore County line. At MP 26.6, approximately 1.9 miles of the existing 500-kV transmission line would be rebuilt 250 feet to the south to avoid existing agricultural and windfarm infrastructure on private land, and Route 8G would follow the current alignment for the existing 500-kV line for approximately 5 miles before leaving the existing 500-kV line and continuing west, still within the WWE corridor, and roughly following the southern leg of the FEIS Route 8A and northern leg of the FEIS Route 9B. At MP 44, it meets up with 9K and parallels the line, approximately 250 feet to the north and east through the rest of the 2015 Jarbidge RMP Planning Area.

**Toana Road Variations:** These variations, just west of Devil Creek, were developed by the BLM to avoid paralleling the Toana Freight Wagon Road, a National Register Historic Site. After the 2013 FEIS, BLM archaeologists determined that the Proposed Route paralleled within 0.25 mile of the Toana Road between MP 38.2 and 40.6, and paralleled within 1 mile of the road through Blue Gulch between MP 40.6 and 43.5.

*Toana Road Variation 1 (Co-Preferred Alternatives 2 and 5):* Toana Road Variation 1 to the Proposed Route is approximately 9 miles in length. It deviates from the Proposed Route at MP 38.2, crossing the Toana Freight Wagon Road at MP 0.3, and continuing in a westerly direction an additional 1.7 miles. The variation then turns north along the base of Castleford Butte and continues an additional 7 miles before rejoining the Proposed Route at MP 46.8, near Balanced Rock Road. Approximately 0.3 mile of the route crosses State land, with the remainder of the route on land managed by the BLM.

*Toana Road Variation 1-A:* The Toana Road Variation 1-A to the Segment 9 Revised Proposed Route was also recommended by BLM to minimize visual impacts to the Toana Freight Wagon Road, but also to utilize existing roads and to minimize new road construction in the area. Variation 1-A also deviates from the Proposed Route at MP 38.2 and follows the same alignment as Variation 1 for the first 2 miles before turning

north. At MP 3.6, the variation crosses, and then closely parallels Kinyon Road an additional 3.4 miles. At MP 7, the alignment turns to the northwest for 1.8 miles, rejoining the Proposed Route at MP 46.8, near Balanced Rock Road. Approximately 1 mile of the route crosses state land, with the remainder of the route variation on land managed by the BLM.

**No Action Alternative:** The No Action Alternative is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

### **3.2.3 Amendments to the 1987 Jarbidge RMP Associated with the Co-Preferred Alternative 2**

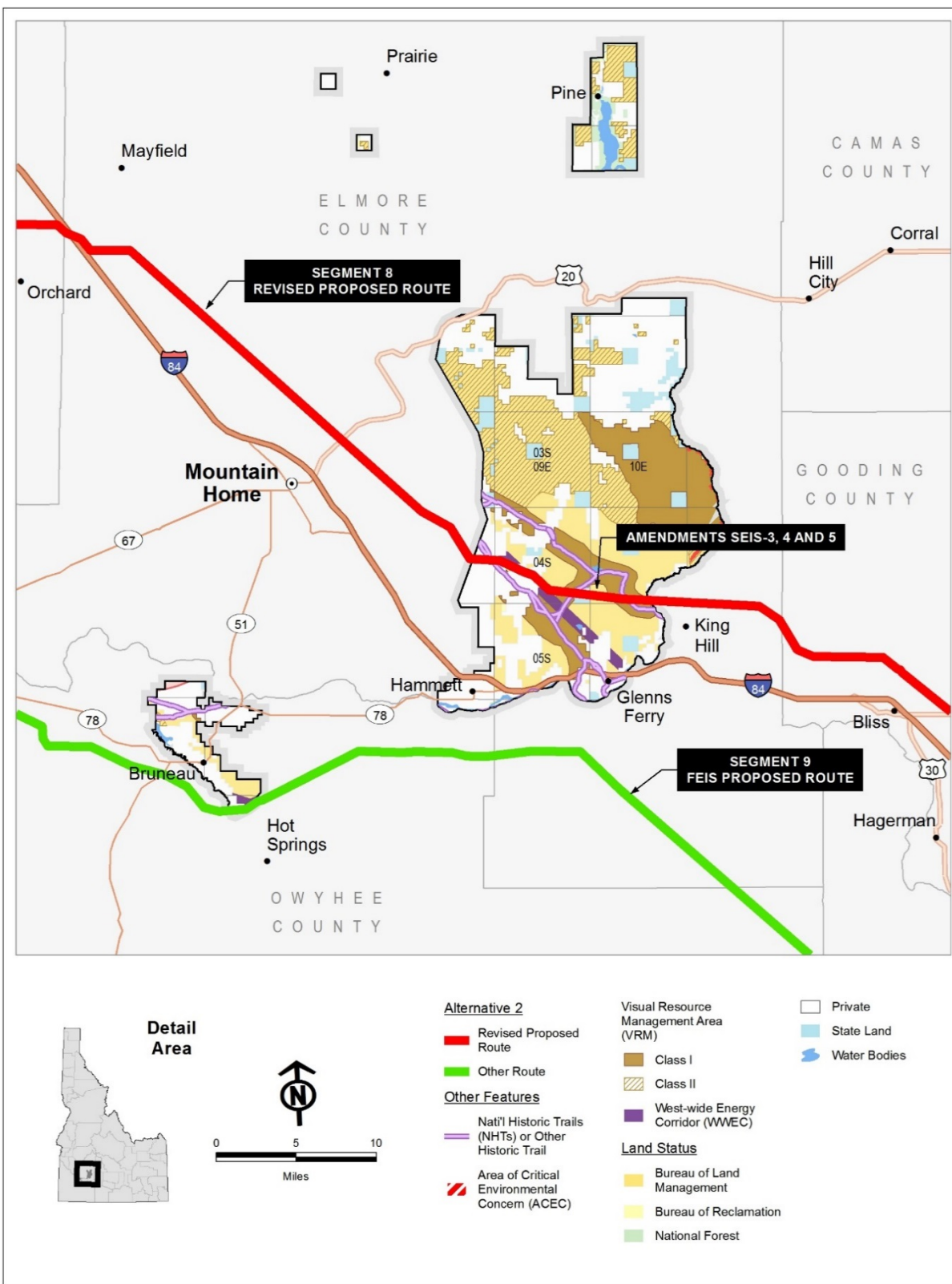
Co-Preferred Alternative 2 contains routing that would require an amendment to the 1987 Jarbidge RMP. Portions of the Revised Proposed Route for Segment 8 (Co-Preferred Alternative 2), Route 8G (Co-Preferred Alternative 5), FEIS Proposed 9 (Co-Preferred Alternative 2), and Route 9K (Co-Preferred Alternative 5) cross areas managed under the 1987 and 2015 Jarbidge RMPs. Approval of the 2015 Jarbidge RMP resulted in no amendments being required for those portions of the routes occurring within the current boundaries of the Jarbidge Field Office. Route 8G, 2013 FEIS Proposed 9, and Route 9K cross the current boundaries of the Jarbidge Field Office and do not cross land still managed under the 1987 Jarbidge RMP; therefore, no additional amendments are associated with these routes. Amendments are therefore only considered for Co-Preferred Alternative 2. Required amendments apply to the Segment 8 Revised Proposed Route where it crosses land in the Four Rivers Field Office that is still managed under the 1987 Jarbidge RMP. This area is north of the current Jarbidge Field Office boundary (Figure F-3). While the impacts from these amendments were analyzed in the 2013 FEIS, the analysis is provided here for continuity. In addition, amendments have been renumbered to conform to the structure of the SEIS.

The Segment 8 Revised Proposed Route would require an amendment where it crosses a utility avoidance/restricted area designated in the 1987 Jarbidge RMP.

**Draft Amendment SEIS-3** for the Segment 8 Revised Proposed Route would amend the Lands decision and would read:

*"The current Lands decision is amended to reclassify the area identified as avoidance/restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way while protecting the Oregon Trail ruts."*

The Segment 8 Revised Proposed Route would require a plan amendment to the 1987 Jarbidge RMP if it was selected to address cultural resources.



**Figure F-3.** Locations of 1987 Jarbidge RMP Amendments for Co-Preferred Alternative 2

**Draft Amendment SEIS-4** for the Segment 8 Revised Proposed Route would amend the Cultural Resources direction in the 1987 Jarbidge RMP. The amendment would read (revisions in italics):

“The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within 0.5 mile corridor of ruts *except where visual impacts are already compromised*. Protect the existing trail ruts from disturbance.”

The Segment 8 Revised Proposed Route would cross VRM Class I land associated with the Oregon NHT. Visual resources are managed according to Map 9 in the Jarbidge RMP. A powerline would not conform to VRM I objectives, and an amendment would be needed.

**Draft Amendment SEIS-5** for the Segment 8 Revised Proposed Route would amend the VRM management and would read:

*“The VRM decision and Map 9 are amended to accommodate a major powerline R/W. The VRM Class I area associated with the proposed 500-kV line and adjacent existing powerlines would be reclassified to VRM Class IV, according to definitions provided in the new manual.”*

### **3.2.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives**

Alternatives 1 and 3 also include the Revised Proposed Route for Segment 8 and would require the same amendments discussed above for the Co-Preferred Alternative 2: Amendments SEIS-3, SEIS-4, and SEIS 5.

Alternative 1 includes Segment 9 of the Revised Proposed Route. Route 8H, which is included in Alternatives 6 and 7, follows the same routing as Segment 9 of the Revised Proposed Route through the Jarbidge area. This alignment crosses land in the Four Rivers Field Office that is still managed under the 1987 Jarbidge RMP. A small parcel of VRM Class II managed land is crossed in this area, just before the route enters the SRBOP for the second time. Segments of the Oregon Trail are present to the north of the alignment. A transmission line would not be consistent with the VRM Class II designation and an amendment would be needed.

The Segment 9 Revised Proposed Route, if selected, would require a plan amendment to the Jarbidge RMP where the route crosses VRM Class II land just east of the SRBOP.

**Amendment SEIS-8** for the Segment 9 Revised Proposed Route and Route 8G would amend the VRM management and would read:

*“The VRM decision and Map 9 are amended to accommodate a major powerline R/W. The VRM Classification is amended to change the VRM Class to VRM Class III, adjacent to the proposed line, where the towers would be visible and dominate the landscape.”*



### **3.2.5 Affected Environment and Environmental Effects**

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Section 3.2 and Appendix G for an analysis of the effects on visual resources; Section 3.3 for effects on cultural resources; Sections 3.6 vegetation; Section 3.10 effects on wildlife; Section 3.11 for effects on special status species; and Section 3.17 for effects on land use and recreation.

Changing Utility/Avoidance area classifications and modifying protection language around cultural resources could result in reduced management actions geared towards protection of archaeological resources. In areas where the VRM class is changed from Class I or II to Class III or IV, an amendment would result in the area being managed at a lower protection level.

#### **3.2.5.1 Effects of Amendments for Routes Associated with Co-Preferred Alternatives**

Changing the restricted/avoidance area to allow a 500-kV ROW would result in reduced protection for the values of the trail for which the restricted area was partially established. The Revised Proposed Route for Segment 8 would cross the North Alternate Study Trail within the restricted/avoidance area. A 220-kV line already crosses the trail near this location. This amendment allowing an additional line, while restricting surface disturbance activities, will further impact the historical landscape within these locations, however, it will still maintain the physical integrity of the trail at the crossing and adjacent locations. The RMP states that “rights-of-way, under Title V of FLPMA, will be considered in the Jarbidge Resource Area except where specifically identified in the RMP for avoidance.” The RMP also protects 9 sites (including the Oregon Trail Area) with “areas of significant public values” through this special designation. Changing the designation in this area to allow the Project, while protecting trail ruts, would not protect the area from visual intrusion and would only protect the physical presence of the trail. The BLM Manual 6280 Study conducted for this Project (see Appendix J in the SEIS) rated the area as having a Scenic Quality Rating of C and concluded that the Project, while creating a strong visual contrast at a local KOP (C1511), would create a moderate adverse visual impact and would not affect the Scenic Quality Rating, due to the existing cultural modifications within the area.

Additionally, changing the restricted area designation around important paleontological sites may impact the fossil resources of the area. While construction disturbance activities could result in the discovery of isolated fossil specimens, the scientific information provided by fossils is maximized by discovery of fossil specimens preserved in place within the host geologic formations, and construction techniques are more likely to damage specimens than discover them. The change in designation could lead to additional development of the corridor, extending the impacts beyond the effects of the Project. Mitigation measures to reduce effects to these resources include surveys in

potential fossil yield areas (PALEO-5), altering surface-disturbing activities and schedules if resources are discovered (PALEO-1) as well as ensuring appropriate management is applied where relevant (PALEO-2 and PALEO-3), and development and following of a Paleontological Resources Preservation Plan (PALEO-4). Additionally, mitigation measures associated with cultural resources (CR-1 through CR-8) will minimize disturbance to cultural resources such as NHTs in the affected area.

Changing the VRM from Class I to Class IV near the Oregon Trail would remove some protections aimed at protecting the visual landscape surrounding the North Alternate Study Trail. This section of the Oregon Trail is currently under review to determine if it should be included as a National Historic Trail. The trails analysis in the BLM Manual 6280 Study (see Appendix J in the SEIS) stated that the Visual Resource Inventory (VRI) rates this area as Class C, which indicates scenery without much diversity in terms of landscape features and is the lowest rating from an aesthetic perspective. As stated above, this analysis also concluded that the presence of a new 500-kV line would not lower the Visual Quality Rating of the area due to existing cultural modifications. The management guidance for the 1987 Jarbidge RMP states that:

“Visual Resource Management – The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400.”

The 1984 BLM Manual 8400 states that the “visual management objectives (classes) are developed through the RMP process for all Bureau lands. The approved VRM objectives shall result from, and conform with, the resource allocation decisions made in RMP’s [sic].”<sup>5</sup> The manual discusses visual design considerations and gives an overview of the Visual Resource Management System and refers the reader to BLM Manual Sections 8410 and 8431 for Visual Resource Inventory and Contrast Rating methods, respectively. The guidance in these two manuals indicates that the area considered in the amendment may no longer qualify as VRM Class I using the VRI directions in Manual Section 8410. Amending the VRM Class I area around the NHT to VRM Class IV would be in keeping with the management direction under the new guidance for visual resource protection. The viewsheds for the trail in this area are already highly compromised, with multiple existing transmission lines running north of the proposed route. In addition, a WWE corridor is designated directly south of the proposed alignment. However, as stated in BLM Manual 8400, the RMP determines the VRM Classification of an area. Therefore, an amendment is still required.

In areas where the VRM class is changed from Class I or II to Class III or IV, an amendment would result in the area being managed at a lower protection level. Amending the VRM Class I area around the NHT to VRM Class IV would be in keeping with the management direction under the new guidance for visual resource protection.

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<sup>5</sup> BLM. 1984. BLM Manual 8400-Visual Resource Management. Available online at: [http://www.blm.gov/style/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.34032.File.dat/8400.pdf](http://www.blm.gov/style/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.34032.File.dat/8400.pdf)

The viewsheds for the trail in this area are already highly compromised, with multiple existing transmission lines running north of the proposed route. In addition, a WWE corridor is designated directly south of the proposed alignment.

EPMs such as using dull galvanized finish on lattice steel towers (VIS-1), using non-reflective finishes on subconductors and insulators (VIS-2 and VIS-9), as well as siting towers and access roads to reduce visual impacts (VIS-5 through VIS-7 and VIS-11) will be used to reduce visual impacts. Amending the RMP to lower the VRM classification may encourage additional development in these areas, which would further impact the visual resources, beyond the Project actions.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the FEIS.

### **3.2.5.2 Effects of Amendments Associated with Route Alternatives and Variations**

Changing the VRM Class II area near the C.J. Strike Reservoir to VRM Class III would reduce the visual protection within the Snake River area. The presence of a tower in this location could impact the visual experience of recreational users along the rim of the canyon. This parcel of VRM Class II area is relatively small, and the proposed project would sit back from the rim, which may reduce the impact of recreational users within the canyon and reservoir. Changing the VRM class could potentially allow for future project to be constructed closer to the canyon rim, which would have increased visibility. The proposed area for reclassification is relatively small, however, and additional plan modification might be required for new projects.

## **3.3 SRBOP RMP Draft Amendments**

The SRBOP RMP,<sup>6</sup> approved in September 2008, guides decisions made by the Four Rivers Field Office regarding actions that occur in the SRBOP Planning Area. These include decisions on the granting of ROWs under Title V of FLPMA. The RMP restricts major utility development to two existing corridors in the SRBOP Planning Area. The RMP also includes management direction for motorized vehicle use, protects visual resources, and prohibits surface disturbing activities near special status species. The Project does not conform to decisions in the SRBOP RMP. Plan amendments would be needed for the Revised Proposed Routes in Segments 8 and 9 regarding utility corridor restrictions, visual resources, and special status species.

An amendment would be needed if any Alternative is selected, since all route combinations cross the SRBOP. Since the Co-Preferred Alternative 2 contains Revised Proposed Routes for Segments 8 and 9, amendments are drafted for the SRBOP RMP (see Table F-3a). Amendments for the SRBOP RMP that are associated with other Alternatives are presented in Table F-3b.

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<sup>6</sup> BLM. 2008. Snake River Birds of Prey National Conservation Area Resource Management Plan and Record of Decision. Boise District Office. September. Available online at: [https://eplanning.blm.gov/epl-front-office/projects/lup/35553/41906/44406/Snake\\_River\\_Birds\\_of\\_Prey\\_RMP\\_RoD\\_2008\\_508.pdf](https://eplanning.blm.gov/epl-front-office/projects/lup/35553/41906/44406/Snake_River_Birds_of_Prey_RMP_RoD_2008_508.pdf)

**Table F-3a. Draft Amendments for the SRBOP RMP**

<b>Affected Alternatives</b>	<b>Number</b>	<b>Affected Route</b>	<b>Existing RMP Direction</b>	<b>Draft Amendment</b>
<b>Co-Preferred Alternative 2</b> Alternative 1 Alternative 3	SEIS-6	Revised Proposed 8	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing Summer Lake line and an additional 500 kV line.
<b>Co-Preferred Alternative 2</b> Alternative 4 Alternative 6	SEIS-7	FEIS Proposed 9	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500 kV line.
<b>Co-Preferred Alternative 2</b> <b>Co-Preferred Alternative 5</b> Alternative 1 Alternative 3 Alternative 4 Alternative 6 Alternative 7	SEIS-8	Revised Proposed 8, FEIS Proposed 9, 8G, Revised Proposed 9, and 9K	Sensitive Plant Habitat Include in all BLM authorizations permitting surface disturbing activities (non-grazing), requirements that (1) affected areas be reseeded with a perennial vegetative cover, and (2) surface disturbing activities be located at least 1/2 mile from occupied sensitive plant habitat.	Gateway West will be allowed within 0.5 mile of occupied, sensitive plant habitat, with appropriate mitigation to protect sensitive plants, including slickspot peppergrass (see Appendix F).
<b>Co-Preferred Alternative 5</b>	SEIS-13	8G and 9K	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include two 500 kV lines.

**Table F-3b.** Amendments for the SRBOP RMP for Non-Preferred Alternatives

<b>Affected Alternatives</b>	<b>Number</b>	<b>Affected Route</b>	<b>Existing MFP Direction</b>	<b>Draft Amendment</b>
Alternative 1 Alternative 6 Alternative 7	SEIS-15	Segment 9 Revised Proposed Route/ 8H	VRM II Protect the Oregon Trail and management areas along the Snake River Canyon as a Visual Resource Management (VRM) Class II area, the Army National Guard Orchard Training Area (OTA) as Class IV and remaining areas as Class III. [Visual Resource Management (VRM Map)]	A corridor 250 feet from the centerline of the proposed powerline would be established with a VRM of Class III. This corridor would maintain a distance of at least 0.5 mile from the NHT, except where it crosses the trail.
Alternative 1 Alternative 6 Alternative 7	SEIS-16	Segment 9 Revised Proposed Route/ 8H	This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values. (2.14 Recreation 2-20).	This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values. Allow a 500-kV transmission line to cross the SRMA while protecting cultural resources from surface disturbance.
Alternative 1 Alternative 6 Alternative 7	SEIS-17	Segment 9 Revised Proposed Route/ 8H	C.J. Strike SRMA: This SRMA consists of 20,000 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir (2.14 Recreation 2-20).	C.J. Strike SRMA: This SRMA consists of 16,900 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir. Allow a 500-kV transmission line to cross the SRMA while protecting the Oregon Trail from surface disturbance.
Alternative 1 Alternative 6 Alternative 7	SEIS-18	Segment 9 Revised Proposed Route/ 8H	VRM II Protect the Oregon Trail and management areas along the Snake River Canyon as a Visual Resource Management (VRM) Class II area, the Army National Guard Orchard Training Area (OTA) as Class IV and remaining areas as Class III. [Visual Resource Management (VRM Map)]	VRM Class II areas associated with the Oregon Trail and Snake River that are in view of the 500-kV transmission line that would not meet VRM Class II objectives of the C. J. Strike SRMA would be reclassified to VRM Class III.

**Table F-3b.** Amendments for the SRBOP RMP for Non-Preferred Alternatives  
(continued)

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
Alternative 1 Alternative 6 Alternative 7	SEIS-19	Segment 9 Revised Proposed Route/ 8H	2.16 Transportation – Close the following areas to motorized vehicles: ... Cove – 1,600 acres (Transportation Map A-145).	The area is closed to motorized vehicle use, subject to authorized use.
Alternative 1 Alternative 6 Alternative 7	SEIS-20	Segment 9 Revised Proposed Route/ 8H	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing 138 kV line and an additional 500 kV line.
Alternative 3	SEIS-21	9K	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500 kV line.
Alternative 4	SEIS-22	8G	Utility and Communication Corridors – Restrict major utility developments to the two utility corridors identified (Lands Map 3).	Restrict major utility developments to the two utility corridors identified (Lands Map 3) and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500 kV line.

### 3.3.1 Purpose and Need to Amend the SRBOP RMP

All routes for all Alternatives cross the SRBOP Planning Area. Route locations were developed to comply with WECC requirements and to protect significant resources to the greatest extent feasible. These include, but are not limited to, TES species, soil resources, cultural resources, and visual resources. The Project is not in conformance with the decisions in the SRBOP RMP and the plan would need to be amended. The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan.

Both Co-Preferred Alternatives would require amendments to the SRBOP RMP. Co-Preferred Alternative 2 utilizes Segment 8 of the Revised Proposed Route and the FEIS Proposed 9 (inclusive of the Toana Road Variation 1). Both of these routes cross the SRBOP outside of existing corridors and would be closer than 0.5 mile to occupied sensitive plant habitat. Co-Preferred Alternative 5 includes Routes 8G and 9K (inclusive of Toana Road Variation 1). These routes would cross the SRBOP 250 feet apart,

crossing outside of a designated corridor and within 0.5 mile of occupied sensitive plant habitat.

The Segment 8 Revised Proposed Route follows the same alignment as the FEIS Proposed Route for the first 91.4 miles. It then deviates from the FEIS Proposed Route alignment and would be 250 feet north of the existing Midpoint to Hemingway (Summer Lake) 500-kV line rather than 1,500 feet south of the line from the eastern boundary of the SRBOP (MP 99.7) to the Hemingway Substation. It would also cross the Snake River north of Guffey Butte, instead of south for the area as in the 2013 FEIS. This means that portions of the route would cross the SRBOP outside of the two designated corridors.

The Segment 9 Revised Proposed Route also crosses the SRBOP. This route is the same as the FEIS Proposed 9 for the first 95.6 miles, and then follows an alignment similar to the FEIS Route 9D/9G from MP 95.6 and 154.7, except that two portions of the route would be double-circuited with existing 138-kV lines within the SRBOP: the first, near C.J. Strike Reservoir and the Bruneau Arm (MP 106.2 to 109.3 and 109.9 to 112.1), and the other along Baja Road (MP 121 to 141.2). Several rebuilds totaling approximately 0.6 mile are also required to tie the existing 138-kV lines into the new double-circuit alignments.

The Segments 8 and 9 Revised Proposed Routes, FEIS Proposed 9, and Routes 8G, 8H, and 9K would cross the SRBOP outside of designated corridors, and cross multiple SRMAs, VRM Class II areas, and cultural resource areas.

The SRBOP RMP restricts utility development to two corridors. Portions of all routes cross the SRBOP outside of these corridors. RMP direction for Lands, Realty, and Utility Corridors states:

“Restrict major utility developments to the two utility corridors identified.” (Lands Map 3)

The RMP provides management direction for sensitive plants. Portions of all routes would cross occupied habitat for sensitive plants, with the Revised Proposed Routes for Segments 8 and 9 and Route 8H crossing the SRBOP for the longest distance of the routing options. EPMs would be followed (see Table 2.7-1 in the FEIS) to avoid or minimize negative impacts to these species or their habitat as required under Conservation Measure 3 – Ensure that new Federal actions support or do not preclude species conservation in slickspot peppergrass habitat (page 4 of the Conservation Agreement [CA]; A-67 of the SRPOB RMP):

“b) If direct or indirect negative impacts to the species or its habitat are anticipated as a result of new BLM actions, the activity will be modified to avoid or minimize negative impacts and, where feasible, promote species conservation.”

As this is in keeping with the RMP, no amendment is needed. However, the RMP also states:

“Sensitive Plant Habitat. Include in all BLM authorizations permitting surface disturbing activities (non-grazing), requirements that (1) affected areas be

reseeded with a perennial vegetative cover, and (2) surface disturbing activities be located at least 1/2 mile from occupied sensitive plant habitat.”

The purpose of the draft amendments for Co-Preferred Alternatives 2 and 5 is to modify SRBOP RMP decisions utility corridors and sensitive plant habitat such that the granting of a ROW for construction of the Project would be in conformance with the RMP. The amendment for sensitive plants would also apply under all other Alternatives.

Under Alternatives 1, 3, 4, 6, and 7, routing for Segments 8 and 9 would cross outside of designated corridors and an amendment, similar to what would be proposed for the Co-Preferred Alternatives, would be needed.

The Segment 9 Revised Proposed Route and 8H would cross VRM Class II areas and would require an amendment to address this nonconformance. The existing Standard Operating Procedures under Section 2.17 (Utility and Communication Corridors) state:

“VRM Class II management areas will not be available for utility corridors.”

The SRBOP RMP has the objective of protecting the visual resources of historic areas with a secondary emphasis on the Snake River Canyon, with the following management action:

“Manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the OTA as Class IV and remaining areas as Class III. [Visual Resource Management (VRM) Map] This will provide reasonable protection of the Oregon Trail and flexibility in managing the remainder of the NCA.”

“VRM Class II management areas will not be available for utility corridors.”

The Class II designation for the Oregon Trail is again stated in Section 2.2 of the SRBOP RMP in the Cultural and Tribal Resources Management Actions (page 2-2):

“Protect the Oregon Trail as a Visual Resource Management (VRM) Class II area. [Visual Resource Management (VRM Map)]”

The Segment 9 Revised Proposed Route and 8H would pass through the Snake River SRMA. This use is not in conformance with the SRMA designation based on “recreational, scenic or cultural values.” The RMP includes the following restriction:

“This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values.” (2.14 Recreation 2-20).

The Segment 9 Revised Proposed Route and 8H would pass through C.J. Strike SRMA. This use is not in conformance with the SRMA designation based on “recreational, scenic or cultural values.” The designation of the C.J. Strike SRMA is defined as:

“C.J. Strike SRMA: This SRMA consists of 20,000 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir.” (2.14 Recreation 2-20)



The RMP includes decisions that close areas to motorized vehicles. The Management Objective currently reads: “Provide motorized vehicle access to the majority of the NCA while reducing the number of unnecessary routes and increasing the non-motorized opportunities.” Portions of the Segment 9 Revised Proposed Route would cross the Cove Non-Motorized Area. The SRBOP RMP states:

“2.16 Transportation – Close the following areas to motorized vehicles: ... Cove – 1,600 acres (Transportation Map A-145)”

Amendments would be needed to modify the utility corridor, visual resource, motorized vehicle, SRMA, and sensitive plant restrictions such that the Project would be in conformance with the SRBOP RMP if Alternative 1, 6, or 7 was selected. If Alternative 3 or 4 is selected, amendments would be needed to modify utility corridor and sensitive plant restrictions.

### **3.3.2 Project Alternatives and Associated Routing**

**Revised Proposed Routes:** The Revised Proposed Routes for Segments 8 and 9, and to a lesser extent Route 8G, Route 8H, FEIS Proposed 9, and Route 9K, would cross through the SRBOP Planning Area. These routes would follow similar alignments as the routes presented in the FEIS but with modifications to reduce impacts to important resources. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall as well as 500/138-kV double-circuit H-frame structures between 160 and 190 feet tall and would cross BLM-managed land covered by the SRBOP RMP. Several additional routes were considered along Segments 8 and 9, which are discussed in Chapter 2 of the SEIS and in the 2013 FEIS. The Revised Proposed Routes and the other routes are described in Chapter 2 of the SEIS, along with the reasons for considering these routes.

The Segment 8 Revised Proposed Route is similar to the original proposed route in the 2013 FEIS except that the line would be 250 feet north of the existing 500-kV line rather than 1,500 feet south of the line from the eastern boundary of the SRBOP (MP 99.7) to the Hemingway Substation. It would also cross the Snake River north of Guffey Butte, instead of south as in the FEIS. The first 91.4 miles of the route is unchanged from the FEIS Proposed Route.

The Segment 9 Revised Proposed Route includes a 139.8-mile single-circuit 500-kV transmission line and 25.5 miles of double-circuit 500/138-kV transmission line between the proposed Cedar Hill Substation near the county line between Cassia and Twin Falls Counties in Idaho and the Hemingway Substation. The Segment 9 Revised Proposed Route follows the same alignment as the FEIS Proposed 9 for 95.6 miles, and then follows an alignment similar to the FEIS Routes 9D/9G from MPs 95.6 and 154.7 (Route 8H would follow this part of the alignment as well), except that two portions of the route would be double-circuited with existing 138-kV lines within the SRBOP: the first, near C.J. Strike Reservoir and the Bruneau Arm (MPs 106.2 to 109.3 and 109.9 to 112.1), and the other along Baja Road (MPs 121 to 141.2). Several rebuilds totaling approximately 0.6 mile are also required to tie the existing 138-kV lines into the new double-circuit alignments. Except for minor variations, the route is unchanged from the FEIS Routes 9D/9G between MPs 141.2 and 154.7. The revised Segment 9 Proposed Route crosses the Snake River south of Sinker Butte, whereas the 2013 FEIS Proposed

Route did not cross the Snake River. From MP 154.7 to the Hemingway Substation, the route is the same as the FEIS Proposed Route. Route 8H follows the same alignment as the Segment 9 Revised Proposed Route through the SRBOP Planning Area.

**Additional Routes:** Under Co-Preferred Alternative 5, both Routes 8G and 9K would cross the SRBOP 250 feet apart and parallel to each other. Their alignment through the SRBOP is very similar to the alignment for Route 9E analyzed in the FEIS, and is the same as the alignment of the Revised Proposed Route for Segment 9 through this easternmost portion of the SRBOP (east of MP 95.6). Routes 8G, 9K, and FEIS Proposed 9 have varying configurations for different Alternatives, but have some degree of parallel routing of Segment 8 and Segment 9 combinations under Alternatives 4, 5, 6, and 7. Routes 8G and 9K cross the SRBOP just south of the WWE corridor at the eastern edge of the SRBOP, while the FEIS Proposed 9 crosses the SRBOP within the WWE corridor except for a small area near the town of Murphy.

**No Action Alternative:** The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in EIS Section 1.4, Proponents' Objectives for the Project), would not be met.

### **3.3.3 Amendments to the SRBOP RMP Associated with the Co-Preferred Alternatives**

Both Co-Preferred Alternatives would require amendments to the SRBOP RMP to be consistent with the land use plan. Co-Preferred Alternative 2 would require Amendments for the Segment 8 Revised Proposed Route and the FEIS Proposed 9. Co-Preferred Alternative 5 would require amendments for Routes 8G and 9K. All routes would require an amendment to the SRBOP RMP to allow surface disturbance from the Project within 0.5 mile of occupied sensitive plant habitat. Segment 8 of the Revised Proposed Route, FEIS Proposed 9, Route 8G, and Route 9K would require plan amendments for granting of a ROW for the Project across lands managed under the RMP. Amendments are proposed for Segment 8 of the Revised Proposed Route and FEIS Proposed 9 for Co-Preferred Alternative 2 (Figure F-4a), and Routes 8G and 9K for Co-Preferred Alternative 5 (Figure F-4b). The SRBOP RMP limits new utilities to existing corridors. FEIS Proposed 9 crosses the SRBOP within the WWE corridor on the east side then again near the town of Murphy, where it is just outside the corridor.

The Revised Proposed Route for Segment 8 (Co-Preferred Alternative 2 and Alternatives 1 and 3) would cross the SRBOP near other transmission lines at the northern end of the Planning Area, as well as through the western portion of the SRBOP, paralleling the existing 500-kV line (approximately 250 feet north of the existing line). An amendment would be required to cross the SRBOP outside of a designated corridor (see Figure F-4).

**Draft Amendment SEIS-6** for the Revised Proposed Route for Segment 8 would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

“Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing Summer Lake 500-kV line and one additional 500-kV line.*”

FEIS Proposed 9 (Co-Preferred Alternative 2, and Alternatives 4 and 6) would cross the SRBOP outside of a designated corridor near the town of Murphy. An amendment would be required to cross this small section of the SRBOP outside of a designated corridor.

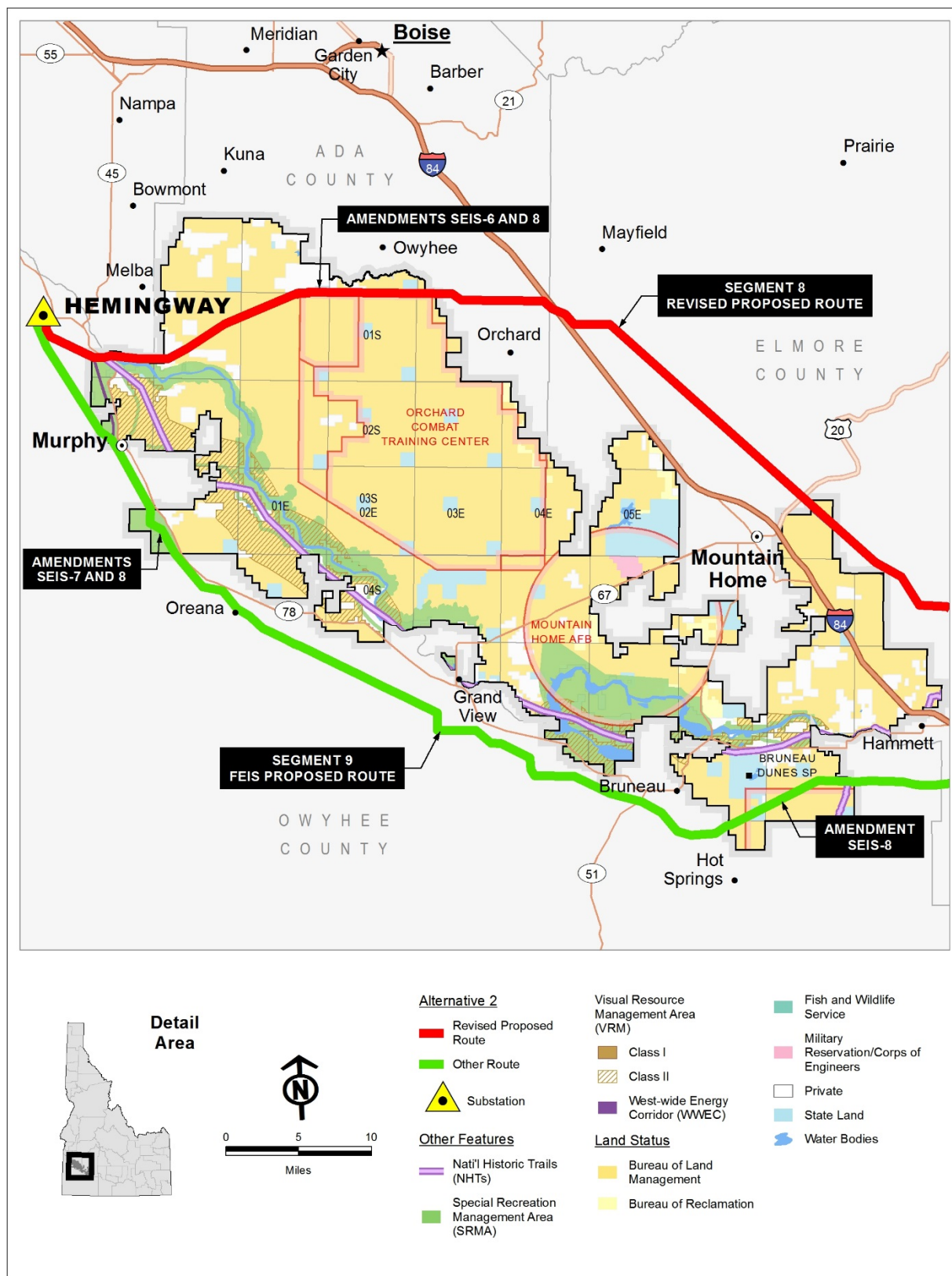
**Draft Amendment SEIS-7** for FEIS Proposed 9 would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

“Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the one additional 500-kV line.*”

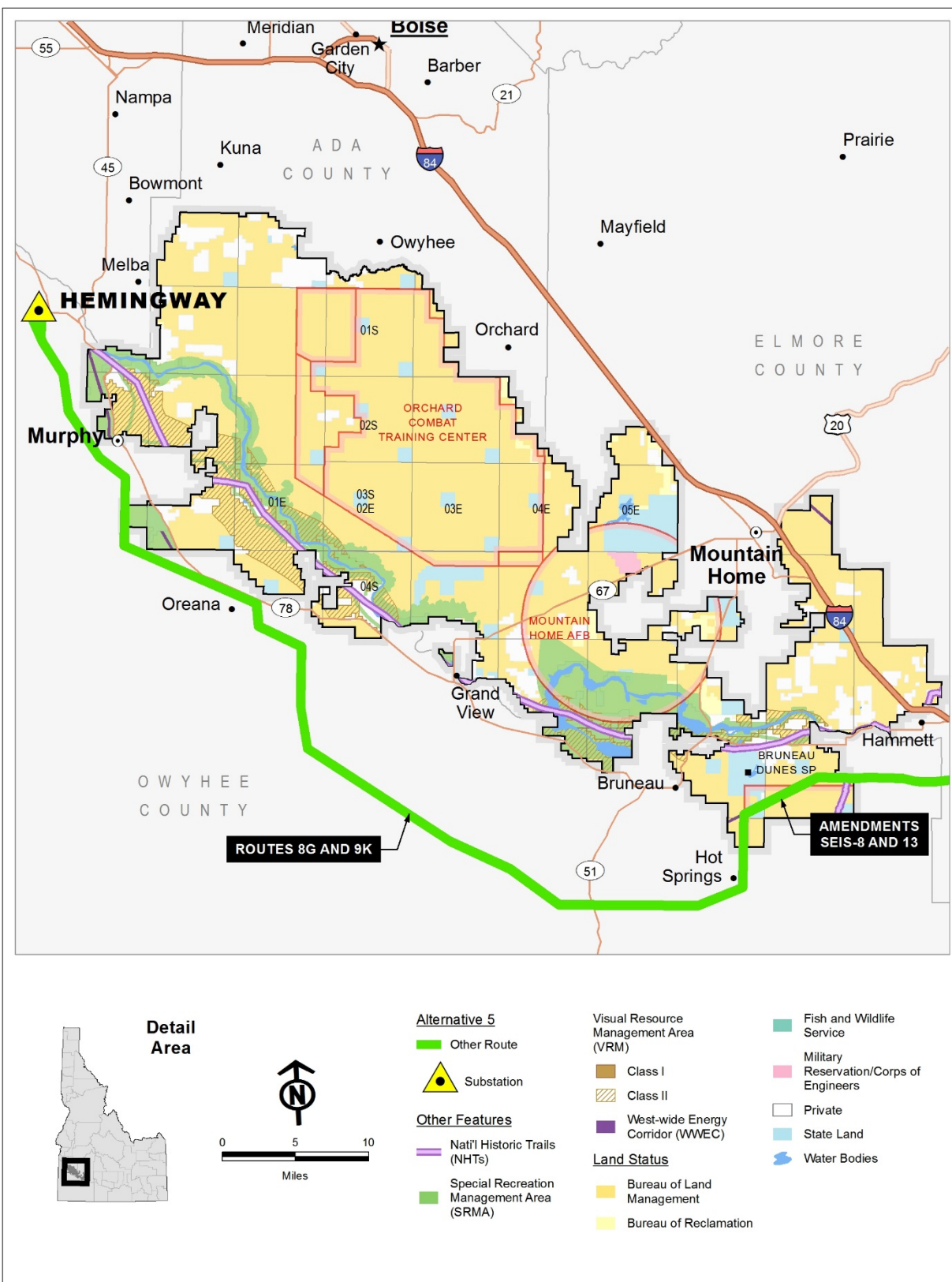
All routes would cross the SRBOP in areas where construction could affect slickspot peppergrass and its habitat in addition to other sensitive plant habitat. The RMP contains management direction restricting surface disturbance and project activity that would disturb this habitat. While potential impacts to slickspot peppergrass will be handled through the *Lepidium papilliferum* CA and consultation with the U.S. Fish and Wildlife Service, the Project would still not meet the distance requirements for all occupied sensitive plant habitat and an amendment would still be required.

**Draft Amendment SEIS-8** for routes in Co-Preferred Alternative 2 (Revised Proposed Route for Segment 8 and FEIS Proposed 9), Co-Preferred Alternative 5 (Routes 8G and 9K), as well as the remaining routes (Revised Propose Route for Segment 9 and Route 8H) would amend the Sensitive Species decision and would read (changes in italics):

“Sensitive Plant Habitat Include in all BLM authorizations permitting surface disturbing activities (non-grazing), requirements that (1) affected areas be reseeded with a perennial vegetative cover, and (2) surface disturbing activities be located at least 1/2 mile from occupied sensitive plant habitat. *Gateway West will be allowed within 0.5 mile of occupied, sensitive plant habitat, with appropriate mitigation to protect sensitive plants, including slickspot peppergrass.* (See Appendix F)”



**Figure F-4a.** Locations of SRBOP RMP Amendments for Co-Preferred Alternative 2



**Figure F-4b.** Locations of SRBOP RMP Amendments for Co-Preferred Alternative 5

Both Routes 8G and 9K would require the same amendment for Utility Corridors under the Co-Preferred Alternative 5. These routes run parallel to each other through a small area of SRBOP RMP-managed lands just west of the Saylor Creek Range. An amendment would be required for crossing the SRBOP outside of a designated corridor.

**Draft Amendment SEIS-13** for Routes 8G and 9K (Co-Preferred Alternative 5) would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

“Restrict major utility developments to the two utility corridors identified and allow an additional *major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include two 500-kV lines.*”

### **3.3.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives**

While Routes 8G and 9K are included in Co-Preferred Alternative 5 (which uses both routes, creating parallel transmission lines through much of the routing), for other Alternatives, the routes are not parallel to each other and therefore different amendments are required. The Revised Proposed Route for Segment 9 and Route 8H are not part of either of the Co-Preferred Alternatives, and additional amendments are required for areas crossed by these routes. Amendments would be needed for crossing VRM Class II areas associated with the Snake River and Oregon Trail, crossing SRMAs, non-motorized areas, outside of designated utility corridors, and within 0.5 mile of sensitive plant habitat. Amendment SEIS-8 is drafted for the Co-Preferred Alternatives and would also apply to all remaining Alternatives.

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to the SRBOP RMP to allow the Project to cross VRM Class II areas.

**Amendment SEIS-15** for the Segment 9 Revised Proposed Route would amend the Visual Resources Management Action to allow the development of the Project (changes in italics):

“Manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the OTA as Class IV and remaining areas as Class III. [Visual Resource Management (VRM) Map] This will provide reasonable protection of the Oregon Trail and flexibility in managing the remainder of the NCA.”

*“A corridor 250 feet from the centerline of the proposed powerline would be established with a VRM of Class III. This corridor would maintain a distance of at least 0.5 mile from the NHT, except where it crosses the trail.”*

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to the SRBOP RMP to allow the Project to cross the Snake River SRMA. This use is

not in conformance with the SRMA designation based on “recreational, scenic or cultural values.”

**Amendment SEIS-16** would amend the Recreation Objectives and Management Actions to reduce the designated area of the SRMA such that the Project would be in conformance with the RMP (changes in italics).

“Snake River Canyon SRMA – This SRMA consists of 22,300 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values.

*Allow a 500-kV transmission line to cross the SRMA while protecting cultural resources from surface disturbance.”*

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to pass through C.J. Strike SRMA. This use is not in conformance with the SRMA designation based on “recreational, scenic or cultural values.” An amendment to allow the project within the C.J. Strike SRMA would be needed for this alignment

**Amendment SEIS-17** would amend the Recreation Objectives and Management Actions to reduce the designated area of the SRMA such that the Project would be in conformance with the RMP (changes in italics):

“C.J. Strike SRMA – This SRMA consists of 20,000 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir.

*Allow a 500-kV transmission line to cross the SRMA while protecting the Oregon Trail from surface disturbance.”*

The Segment 9 Revised Proposed Route and Route 8H would require an amendment to the SRBOP RMP to construct the Project through VRM Class II managed areas.

**Amendment SEIS-18** would amend Visual Resource Management Actions of the SRBOP RMP (changes in italics):

*“VRM Class II areas associated with the Oregon Trail and Snake River that are in view of the 500-kV transmission line that would not meet VRM Class II objectives of the C. J. Strike SRMA would be reclassified to VRM Class III”*

The Segment 9 Revised Proposed Route and 8H would require an amendment to the SRBOP RMP to construct the Project through the Cove Non-motorized Area.

**Amendment SEIS-19** would amend Transportation Management Actions of the SRBOP RMP, which closes 1,600 acres near Cove to motorized vehicles (changes in italics):

“Close the following areas to motorized vehicles: ...Cove – 1,600 acres (Transportation Map A-145).

*The area is closed to motorized vehicle use, subject to authorized use”*



Both Segment 9 of the Revised Proposed Route and Route 8H would require the same amendment for Utility Corridors. These routes have the same alignment through the SRBOP. An amendment would be required for crossing the SRBOP outside of a designated corridor.

**Amendment SEIS-20** for Segment 9 of the Revised Proposed Route and 8H would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

*“Restrict major utility developments to the two utility corridors identified and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include the existing 138kV line and one additional 500-kV line.”*

Routes 9K (Alternatives 3 and 7) and 8G (Alternative 4) would cross the SRBOP outside of designated corridors, west of Saylor Creek training area, and not parallel with each other. An amendment would be required to cross the SRBOP outside of a designated corridor.

**Amendment SEIS-21** for Route 9K would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

*“Restrict major utility developments to the two utility corridors identified and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500-kV line.”*

**Amendment SEIS-22** for Route 8G would amend the Utility and Communications Corridors Management action to allow development of this Project (changes in italics):

*“Restrict major utility developments to the two utility corridors identified and allow an additional major powerline ROW as applicable with laws and values for which the SRBOP NCA was designated. Designate an additional corridor to include a 500-kV line.”*

The Project would be microsituated through the corridor to the extent feasible in order to reduce impacts to adjacent resources. Mitigation, including off-site compensatory mitigation, is discussed below.

The Segments 8 and 9 Revised Proposed Routes would pass through designated utility corridor and ROW Avoidance Area around a National Register Historic District. Multiple routing alternatives for passing through this area were evaluated in the FEIS. The Revised Proposed Route for Segment 8 crosses the northwestern tip of this area for approximately 0.5 mile, parallel to an existing 500-kV line. The Segment 9 Revised Proposed Route crosses through the middle of this area, heading west-northwest through the avoidance area after crossing the Snake River near the Swan Falls Dam. While it was determined that no amendment was required for this routing, significant mitigation measures and specific route determination would be required to avoid areas of cultural resources and traditional properties.



The purpose of the amendments associated with these routes would be to modify the utility corridor, visual resource, and sensitive plant restrictions such that the Project would be in conformance with the SRBOP RMP.

### **3.3.5 Affected Environment and Environmental Effects**

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 and Appendix G for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 and 3.10.2.3 for effects on wildlife; Section 3.11.2.2 for effects on special status species; Section 3.15.2.3 for effects on soils; and Section 3.17.2.3 for effects on land use and recreation.

Approximately 25 miles of the Segment 9 Revised Proposed Route would cross within the boundaries of the SRBOP, approximately 15 miles of which would cross the SRBOP on BLM-administered land. The area that would be crossed is predominantly undeveloped and characterized by numerous draws and gulches with sparse vegetation. However, Segment 8 follows existing lines for the length of its route through the SRBOP, and Segment 9 follows existing lines for approximately half of its length in the SRBOP. Route 8H follows the same alignment as the Segment 9 Revised Proposed Route through the SRBOP. Much of the routes would be able to utilize existing road networks; however, some areas would require construction of new roads. Allowing the transmission line through this landscape would increase the human presence by occupation of infrastructure and creation of dedicated travel routes for construction and operations.

Routes 8G and 9K would cross the southeastern portion of the SRBOP within the Section 368 corridor (WWE corridor), but not a corridor designated in the RMP, for approximately 6.5 miles and then turn south, outside of the WWE corridor for 2.2 miles before re-entering the 2015 Jarbidge RMP Planning Area.

FEIS Proposed 9 would cross the southeastern portion of the SRBOP within the Section 368 corridor (WWE corridor), but not a corridor designated in the RMP, for approximately 7.7 miles. The alignment stays within the corridor for the majority of the remainder of the route. There is a small section near the town of Murphy that would be on BLM-managed land within the SRBOP and outside of a designated corridor for just under 1 mile (See Figure F-4a).

#### **3.3.5.1 Effects of Amendments for Routes Associated with Co-Preferred Alternatives**

##### **Co-Preferred Alternative 2**

Co-Preferred Alternative 2 would include Revised Proposed Route for Segment 8 and FEIS Proposed 9. Approximately 15 miles of the Revised Proposed Route for Segment 8 would cross the SRBOP on BLM-managed land, paralleling an existing 500-kV line.

This is not in a designated corridor, and creating a corridor would impact resource management objectives. FEIS Proposed 9 was analyzed in the 2013 FEIS. This route would cross the SRBOP in two locations. In the eastern end of the SRBOP, the route would cross BLM-managed land within the SRBOP within the Section 368 corridor (WWE corridor), but not within a corridor designated in the RMP. The route again enters the SRBOP south of the town of Murphy, within a designated corridor; however, approximately 1 mile of the route is on BLM-managed land outside of a designated corridor. The amendment (SEIS-7) would expand the area managed as utility corridors; however, the distance is short and utility corridors in the SRBOP are narrow (around 1,000 feet wide or less). Revised Proposed Route 8 would also cross the SRBOP in two locations. In the north, it would cross just north of an existing narrow corridor, and then would parallel the existing 500-kV line through the western portion of its route through the SRBOP. While this route would be 250 feet to the north of an existing line, a corridor was not designated for the existing line, so an amendment would be needed (SEIS-6). This would result in the designation of the land as a narrow corridor, which directly affects how the land within the corridor is managed.

The Segment 8 Revised Proposed Route avoids the majority of the Utility Avoidance area in the SRBOP, crossing it for less than three-tenths of a mile, before exiting the SRBOP to the west. While it was determined that an amendment was not needed for crossing the Utility Avoidance area, a description of the routing and implications is needed. The route would cross this small section, and the top of the Utility Avoidance Area, 250 feet north of the existing transmission line. This routing uses existing roads through the SRBOP for most of its length, and routing through the Utility Avoidance Area is required using this alignment to meet reliability requirements with the Segment 8 Revised Proposed Route. Approximately 9 miles of Revised Proposed 9/8H route (Alternatives 1, 6, and 7) would cross the Avoidance Area. An alternative that avoids this area has been developed for the SEIS, Route 8G, which avoids the majority of the SRBOP and would not cross the Utility Avoidance area. Allowing construction in the Utility Avoidance Area and in areas of high cultural importance, such as a National Register Historic District, could impact the ability to meet management objectives of protecting these areas and maintaining the cultural landscape. Potential impacts could include loss of historic artifacts, loss of historic character of the landscape, and diminished traditional cultural properties and resources. "Significant mitigation" would be required to limit these impacts as described in the SRBOP Record of Decision (pages 2-1 and 2-2), which could involve extensive cultural surveys, micrositeing, data recovery, and on-site mitigation.

In addition to needing amendments for utility corridors, the routes for Co-Preferred Alternative 2 (Revised Proposed 8 and FEIS Proposed 9) would also require an amendment for allowing surface disturbance within 0.5 mile of occupied sensitive plant habitat (SEIS-8). As discussed in the amendment, this action would require surveys and on-site review to ensure disturbance is minimized. The sensitive plant direction was initiated to prevent further impacts to the survival of sensitive species and species of concern. This amendment could result in a need for more active management of affected habitats to ensure the intent of the management actions in the RMP are upheld.

### **Co-Preferred Alternative 5**

Co-Preferred Alternative 5 would include Routes 8G and 9K. These routes run parallel, 250 feet from each other, through approximately 9 miles of the eastern portion of the SRBOP. Approximately 2.2 of those miles are outside of any designated corridor, while the remaining are within a Section 368 corridor (WWE corridor). Draft Amendment SEIS-14 permits the Project and establishes a narrow corridor for the routes in this area. While the effects at the location will be larger for this Alternative, compared to alternatives where only one route is located in this area, it should be noted that impacts such as surface disturbance would be reduced because the same roads can be used for either line. Impacts from amending the RMP to allow a transmission line outside of designated corridors are similar to those discussed above for FEIS Proposed 9, but limited to the location crossed at the southwest end of the SRBOP. Sensitive plants are located within 0.5 mile of the alignments for these alternatives and therefore construction within this boundary could increase risk of disturbance to these communities. Implementation of EPMs to identify and minimize disturbance where sensitive plants are located would reduce this risk.

#### **3.3.5.2 Effects of Amendments for Routes not Associated with the Co-Preferred Alternatives**

Alternative 1 includes the Revised Proposed Routes for Segments 8 and 9. Effects associated with the Revised Proposed Route for Segment 8 have already been discussed for Co-Preferred Alternative 2. Effects associated with Revised Proposed 9 are discussed below. Alternatives 6 and 7 would include Route 8H, which would be the same as Revised Proposed Route for Segment 9 within the SRBOP, and are discussed below.

#### **Segment 9 Revised Proposed Route and 8H**

The Revised Proposed Route for Segment 9 (Alternative 1) and Route 8H (Alternatives 6 and 7) would require the most amendments to the SRBOP RMP of any of the other routes.

Changing the VRM Class II designations and allowing the Project within the Snake River SRMA (Amendments SEIS-15 and SEIS-16, respectively) could affect the ability to meet the management plan objectives. Within the SRMAs, these Visual Resource objectives include protecting visual resources of historic areas. Changing the VRM class would reduce the level of protection for those areas being changed. The VRM areas proposed for reclassification to VRM Class III are within 250 feet of the route centerline, which would likely preclude additional major powerlines from being developed in the same area, due to separation requirements. The lower visual protection, however, could make it easier for other types of disturbance to the visual landscape to occur. The construction of the transmission line, if approved, would adversely affect the historic character of place where it is installed because it would dominate the landscape. Visitors to the Oregon Trail would be affected by the visual impact of a high-voltage transmission line within the proximity of the trail.

In the C.J. Strike SRMA, changing the VRM class would not be consistent with the management of those areas within the SRMA. The SRMA was established partially for scenic values associated with the Oregon Trail; therefore, the amendment to allow the

500-kV transmission line, while protecting the physical characteristics of the trail, is required to maintain consistency with the SRMA management in the revised RMP. While the transmission line would impact scenic values within the SRMA, maintaining the land within the SRMA allows the area to continue to be managed for recreational values and protection of the Oregon Trail through more concentrated management of the area.

While it was determined that an amendment was not needed for crossing the Utility Avoidance Area, a description of the routing and its effects is needed to explain how this will affect management in this area. The routing up to Salmon Falls Dam follows the existing transmission line through the southern portion of the SRBOP. This routing uses existing roads through the SRBOP for most of its length, and routing through the Utility Avoidance Area is needed to take advantage of these existing infrastructure, which helps reduce overall impacts to the SRBOP from the Project. This routing is proposed in conjunction with Revised Proposed 8 (Alternative 1), FEIS Proposed 9 (Alternative 6), or Route 9K (Alternative 7) to meet the Proponents' reliability requirements. Routes 8G, 9K, and FEIS Proposed 9 all avoid this area. Co-Preferred Alternative 2 and Alternative 3 include the Segment 8 Revised Proposed Route, which crosses the avoidance area for less than half a mile, parallel to an existing line. Co-Preferred Alternative 5 and Alternative 4 avoid this management area, utilizing Routes 8G, 9K, and FEIS Proposed 9. Allowing construction in the Utility Avoidance Area and in areas of high cultural importance, such as a National Register Historic District, could impact the ability to meet management objectives of protecting these areas and maintaining the cultural landscape. Potential impacts could include loss of historic artifacts, loss of historic character of the landscape, and diminished traditional cultural properties and resources. "Significant mitigation" would be required to limit these impacts as described in the SRBOP Record of Decision 2-1, which could involve extensive cultural surveys, micrositeing, data recovery, and on-site mitigation.

Amending the RMP to close the Cove Non-Motorized Area to motorized use, subject to authorized use (SEIS-19), allows for authorized actions within this area. This allows for emergency actions as well as the construction of the Project without changing the general management strategy for the area. This area was designated to allow restoration of the landscape. Allowing motorized use in the Cove Non-Motorized Areas could impact the ability of meeting goals for landscape restoration. Careful planning of motorized use for Project construction and maintenance access in these areas can reduce the negative effects. Construction within slickspot peppergrass suitable habitat will require surveys to ensure occupied habitat is not disturbed, in accordance with the CA. Micrositeing and thorough surveys would be required to avoid damage to populations near the construction and operations areas (TESPL-4).

The SRBOP RMP contains conservation measures for the protection of slickspot peppergrass and its habitat. Slickspot peppergrass was listed as threatened under the Endangered Species Act in 2009, but the listing was remanded by the Idaho District Court in 2012 (see Section 3.7.1.5 of the FEIS); however, the BLM's management of the species has not changed. All routes would cross potential and occupied sensitive plant habitat within the SRBOP; therefore, the RMP and associated CA for occupied habitat would apply. While the project would be evaluated under the CA as well as

through consultation with U.S. Fish and Wildlife Service, an amendment would still be needed (SEIS-8), as the Project is unlikely to be able to remain 0.5 mile or more from occupied habitats at all times. The Project includes EPMs to protect natural resources (see Table 2.7-1 in the FEIS). Specific EPMs are included to protect slickspot peppergrass habitat, which involve surveys for plants within 50 feet of construction prior to ground disturbance in all three BLM categories of slickspot peppergrass habitat, not constructing within 50 feet of identified plants or known previously occupied areas, limiting disturbance, and using appropriate methods for soil storage and seeding during reclamation activities (TESPL-4).

Because the SRBOP was designated, in large part, to protect raptor species, any impacts to raptors could affect the ability of the SRBOP to meet their management goals. The towers and conductors would be constructed following Avian Power Line Interaction Committee recommendations in avian habitat (WILD-3). Mitigation measures such as avoiding guyed towers where possible (TESWL-11 and WILD-6), and installing anti-collision devices where required could further lower the impacts to raptor species (WILD-6 and WILD-7).

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the FEIS. The Proponents have developed an MEP that contains design features specific to the SRBOP. This plan was developed to mitigate the effects of Project-related impacts within the SRBOP, as well as comply with the SRBOP's enabling statute (P.L. 103-64) which requires enhancement of resources within the SRBOP. A description of the MEP is in Chapter 2 and the effects analysis is discussed by resource in Chapter 3 of this SEIS. The BLM identified additional measures that could be conducted in addition to those proposed in the Proponents' MEP in order to compensate for Project-related residual impacts as well as enhance the resources that the SRBOP was established to manage. The BLM's additional measures are described in the Chapter 3 resource effects analysis.

The degree to which these measures are adopted will affect how implementation of the RMP amendments would affect the ability of the SRBOP to be managed according to the reason for its creation. Plan amendments that would reduce the level of protection for certain areas, such as around the Snake River and Oregon Trail, directly impact the ability to meet goals for land protection. In addition, crossing areas that are specifically designated to not permit road construction or transmission lines would affect management goals for which those prohibitions were designated. Implementation of enhancement measures would reduce the overall degradation to the resources in the SRBOP from the project and therefore improve the ability of the SRBOP to be managed according to the RMP goals and objectives.

### **Routes 8G, 9K, and FEIS Proposed 9**

While these routes were discussed for the Co-Preferred Alternatives, it is worth discussing the difference between the effects of amending the RMP for the Co-Preferred Alternatives versus the other Alternatives. An amendment is drafted for allowing two parallel lines (8G and 9K) to cross the SRBOP under Co-Preferred Alternative 5. These parallel lines would deviate from the designated corridor south of the Bruneau Dunes, creating a corridor with two parallel lines, 250 feet apart. In Alternative 4, only one route, Route 8G, would follow this route, while FEIS Proposed 9

would utilize the Section 368 corridor (WWE corridor) through this area of the SRBOP. Amending the RMP to allow the routes in this alternatives would therefore result in utilizing two different corridors through a short section of the eastern SRBOP, as well as the effects of FEIS Proposed 9 outside of the corridor near Murphy. Alternative 3 would utilize the Revised Proposed Route of Segment 8 and Route 9K. Only one transmission line would be permitted outside of the corridor in the southeast section of the SRBOP whereas Alternative 5 would have two parallel lines. However, Alternative 3 would also have the impacts described above for Revised Proposed Route of Segment 8. Alternative 7 would have the same Segment 9 effects as Alternative 3 (using Route 9K), but would also have the same effects as described above for Revised Proposed 9, as it shares the same alignment with 8H through the SRBOP. Alternative 6 would have the same Segment 9 effects as Co-Preferred Alternative 2, but would also include effects described for Alternative 1, and 6 regarding routing of 8H through the NCA.

### **Alternative Comparison**

Alternative 1 would include the most disturbance within the SRBOP. This Alternative includes impacts from both Revised Proposed Routes. As discussed in Section 3.3.5.1, the Revised Proposed Route for Segment 8 follows the existing Summer Lake line for much of its route through the SRBOP. This alignment minimizes disturbance to new areas, and enables the Project to use more existing infrastructure (such as roads for the existing transmission line); however, it would create new ground disturbance through a larger portion of the SRBOP than Route 8G, and result in two parallel transmission lines through the NCA in this area. While the Revised Proposed Route for Segment 9 would also follow the alignment of an existing line, it would do so for only part of the route through the SRBOP and would result in changing an existing 138-kV line into a double-circuit line for part of its route, which would increase the visual disturbance in the area. This route crosses multiple areas managed for visual resources and amendments would decrease the ability to manage to these resource objectives. The western portion of the route would cross an area with no existing transmission lines and sensitive Oregon Trail and other historic management objectives.

Alternative 3 would have similar effects in the SRBOP as Co-Preferred Alternative 2 because it would include the Segment 8 Revised Proposed Route and Route 9K. Amendment effects would differ for Segment 9 in that the 9K route crosses the SRBOP outside existing corridors at the east side of the NCA, while FEIS Proposed 9 (used in Co-Preferred Alternative 2) is within the Section 368 corridor (WWE corridor) in that area and is not outside of the corridor until it crosses near Murphy.

Alternative 4 would have similar effects in the SRBOP as Co-Preferred Alternative 5. Similar to Alternative 5, this Alternative would avoid crossing the northern and western portion of the SRBOP that is crossed by the Segment 8 Revised Proposed Route. Unlike Co-Preferred Alternative 5, however, the routes would not be parallel where they do cross the SRBOP. This results in two different areas being crossed at the eastern edge of the NCA, as well as the crossing of the NCA by FEIS Proposed 9 near the town of Murphy.

Alternatives 6 and 7 have very similar effects in the SRBOP. Route 8H is used in both Alternatives, resulting in a need for the same amendments required for the Segment 9

Revised Proposed Route. As discussed for Alternative 1, these amendments could affect the ability to manage visual and cultural resources to the level currently desired.

### 3.4 Bennett Hills/Timmerman Hills MFP Draft Amendments

The Bennett Hills/Timmerman Hills MFP<sup>7</sup> provides direction for management of public land under the jurisdiction of the Shoshone Field Office in south-central Idaho. The Bennett Hills/Timmerman Hills MFP Planning Area consists of approximately 892,000 acres in Blaine, Camas, Elmore, Gooding, and Lincoln Counties and guides actions such as the granting of ROW under Title V of FLPMA. The MFP includes management objectives and recommendations for scenic and cultural resources. The proposed crossing of the Oregon NHT would impact visual resources and archeological resources; thus, the proposed Project would not be in conformance with the Bennett Hills/Timmerman Hills MFP. An amendment would be needed if any Alternative containing the Segment 8 Revised Proposed Route is selected (Alternatives 1 through 3). Since Co-Preferred Alternative 2 contains the Segment 8 Revised Proposed Route, amendments are drafted for the Bennett Hills/Timmerman Hills MFP (see Table F-4).

**Table F-4.** Draft Amendments for the Bennett Hills/Timmerman Hills MFP

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
<b>Co-Preferred Alternative 2</b> Alternative 1 Alternative 3	SEIS-9	Revised Proposed 8	REC 4.1 – No management activity should be allowed to cause any evident changes in the form, line, color, or texture that is characteristic of the landscape within this Class II area.	The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified to VRM III (including the existing ROW).
<b>Co-Preferred Alternative 2</b> Alternative 1 Alternative 3	SEIS-10	Revised Proposed 8	REC 14.6 – Prohibit all land disturbing developments and uses on archeological sites.	Manage all cultural resources with applicable laws and policies.

#### 3.4.1 Purpose and Need to Amend the Bennett Hills/Timmerman Hills MFP

Co-Preferred Alternative 2, Alternative 1, and Alternative 3 include the Revised Proposed Route for Segment 8. The alignment for the Segment 8 Revised Proposed Route through the area managed under the Bennett Hills/Timmerman Hills MFP has not changed from the alignment analyzed in the 2013 FEIS. Approximately 21 miles of the Segment 8 Revised Proposed Route would cross through the Bennett Hills/Timmerman Hills Planning Area, approximately 15 miles of which would be on BLM-managed lands. This route would cross 6.3 miles of VRM Class II lands as well as crossing the Oregon NHT. The location of the Proposed Route was identified to comply with WECC

<sup>7</sup> BLM. 1980. Bennett Hills/Timmerman Hills Management Framework Plan. BLM Shoshone Field Office, U.S. Department of Interior.

requirements and to protect important resources to the greatest extent feasible. These resources include, but are not limited to, threatened and endangered plants, wildlife, sensitive lands, and archeological and visual resources.

Because the Project does not conform to the Bennett Hills/Timmerman Hills MFP, land use plan amendments would be needed if the Segment 8 Revised Proposed Route is selected. The planning regulations at 43 CFR 1601 provide for a process to consider plan amendments for actions that are not in conformance with the plan.

The Bennett Hills/Timmerman Hills MFP management objective REC 4.1 for visual resources is to “manage the visual resources within the Planning Area in conformance with the guidance in BLM Manual 6310.18B-E.” The recommendation for achieving this follows:

“No management activity should be allowed to cause any evident changes in the form, line color or texture that is characteristic of the landscape within this Class II area.”

The decision for meeting the objective is to use the above recommendation as “guidance for the Class II areas, utilizing concealment, repetition of elements, minimizing surface disturbance, etc., to meet the goal” (Bennett Hills-Timmerman Hills MFP; Recreation 4.1). Draft Amendment SEIS-9 addresses the Project’s nonconformance with the guidance in the Bennett Hills Timmerman Hills MFP regarding REC 4.1.

The Bennett Hills/Timmerman Hills MFP Management Objective for cultural resources is to “identify, evaluate, and manage cultural resources in the Bennett Hills-Timmerman Hills Planning Units” (Bennett Hills-Timmerman Hills MFP; Recreation R-14). The management recommendation, REC 14.6, for Class I archaeological resources, emphasizes the following:

“Prohibit all land disturbing developments and uses on archeological sites.”

Draft Amendment SEIS-10 addresses the Project’s nonconformance with the guidance in the Bennett Hills Timmerman Hills MFP regarding REC 14.6.

The purpose of the draft amendment is to 1) modify the VRM class designation for areas along existing transmission line ROWs and 2) modify limitations protecting the Oregon NHT. These amendments would allow the Project to conform to the Bennett Hills/Timmerman Hills MFP if the Segment 8 Revised Proposed Route is selected.

### **3.4.2 Project Alternatives and Associated Routing**

The Segment 8 Revised Proposed Route follows the FEIS Proposed Route for the first 91.4 miles, including the area through the Bennett Hills/Timmerman Hills Planning Area. Segment 8 of the Proposed Route is a single-circuit 500-kV transmission line that would link the Midpoint and Hemingway Substations. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Bennett Hills/Timmerman Hills MFP. Several alternative segments, including the routes evaluated in the 2013 FEIS (Proposed Route, BLM-Preferred Route, and additional routes) were considered. The Revised Proposed Route is described in Chapter 2 of the SEIS, along with the reasons for considering this route and other routes considered but not assessed in detail or



previously assessed in the FEIS. Appendix A, Figure A-1 of the SEIS shows the Segment 8 Revised Proposed Route.

**Revised Proposed Route:** The Segment 8 Revised Proposed Route (Co-Preferred Alternative 2 and Alternatives 1 and 3) enters lands managed by the Bennett Hills/Timmerman Hills MFP north of Tuttle and east of Bliss, Idaho. The route is located in a northwesterly direction, spans approximately 21 miles of the southwest corner of the Bennett Hills/Timmerman Hills management area, and parallels an existing 230-kV transmission line. The route is located south of the Pioneer Reservoir, crosses the Gooding County/Elmore County line, and leaves the Bennett Hills/Timmerman Hills management area east of King Hill. An amendment would be needed if the Co-Preferred Alternative 2, Alternative 1, or Alternative 3 were selected.

**Additional Routes:**

*Route 8G* would not cross land managed under the Bennett Hills/Timmerman Hills MFP; therefore, no amendment would be needed to the Bennett Hills/Timmerman Hills MFP if an Alternative containing this route (Co-Preferred Alternative 5 and Alternative 4) were selected.

*Route 8H* would not cross land managed by the Bennett Hills/Timmerman Hills MFP, and therefore no amendments would be needed for this MFP for Alternatives containing this route (Alternatives 6 and 7). This route would, however, cross through the SRBOP, and multiple amendments would be required for that RMP.

**No Action Alternative:** The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in Section 1.4, Proponents' Objectives for the Project), would not be met.

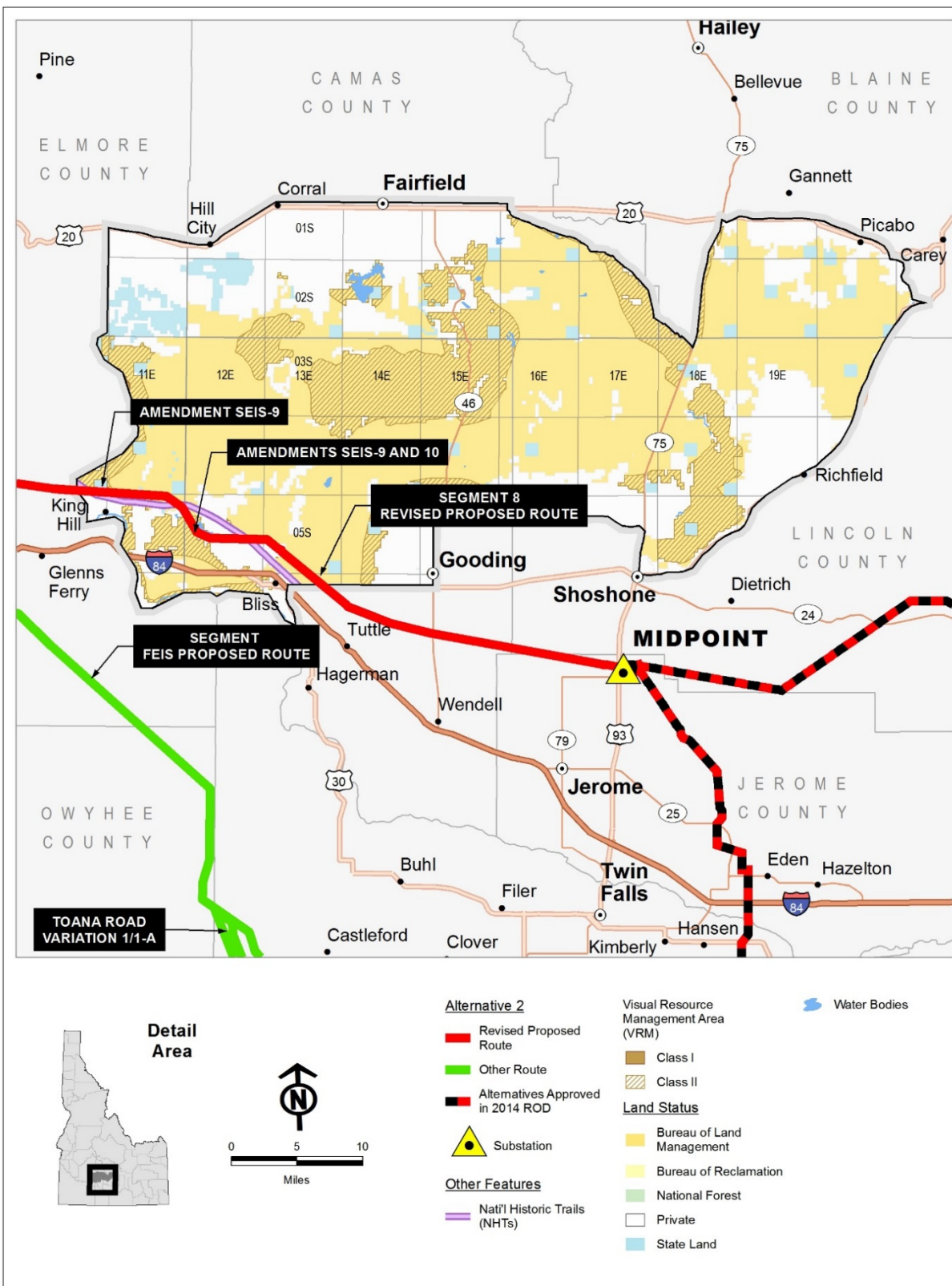
### **3.4.3 Draft Plan Amendments to the Bennett Hills/Timmerman Hills MFP**

The Co-Preferred Alternative 2 includes the Segment 8 Revised Proposed Route. The Segment 8 Revised Proposed Route, if selected, would require a plan amendment to the Bennett Hills/Timmerman Hills MFP for granting of a ROW for the Project across lands managed by the Shoshone Field Office. Amendments are drafted for Segment 8 Revised Proposed Route for Co-Preferred Alternative 2 (Figure F-5). The Bennett Hills/Timmerman Hills MFP protects visual and archeological resources. These protections would be rewritten to allow development of this Project.

The route would cross land managed as VRM Class II. A 500-kV transmission line would not conform to this VRM Classification and an amendment would be needed.

**Draft Amendment SEIS-9** for the Segment 8 Revised Proposed Route would amend the visual resource protection in this area to allow development of this Project:

“The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified to VRM III (including the existing ROW).”



**Figure F-5.** Locations of Bennett Hills/Timmerman Hills MFP Amendments for Co-Preferred Alternative 2

The route would cross land managed for archaeological sites. Existing management requirements in this area prohibits all land-disturbing developments in the area. Project disturbance would not conform to this restriction, and an amendment would be needed for the Project to cross.

**Draft Amendment SEIS-10** for the Segment 8 Revised Proposed Route would amend the archaeological resource protection in this area to allow development of this Project and therefore allow crossing of the Oregon NHT by the Project. The amended MFP decision (changes in italics) would read:

*“Manage all cultural resources with applicable law and policy.”*

#### **3.4.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives**

There are no additional amendments for routes that are not included for Co-Preferred Alternative 2. Alternatives 1 and 3 also contain the Revised Proposed Route for Segment 8 and therefore the amendments discussed for Co-Preferred Alternative 2 apply.

#### **3.4.5 Affected Environment and Environmental Effects**

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 and Appendix G for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 for effects on wildlife; Sections 3.11.2.2 and 3.11.2.3 for effects on special status species; and Sections 3.17.2.2 and 3.17.2.3 for effects on land use and recreation. The following effects are the same as those discussed in the FEIS because the routing is the same as the FEIS Preferred Route through this area.

##### **3.4.5.1 Effects of Amendments for Routes Associated with Co-Preferred Alternatives**

Co-Preferred Alternative 2 includes Segment 8 of the Revised Proposed Route and would therefore be affected by amendments needed for this route to conform to the Bennett Hills/Timmerman Hills MFP.

Transmission line towers would not occur within 330 feet of the Oregon NHT; however, transmission lines would span the trail where the Segment 8 Revised Proposed Route crosses. Allowing land-disturbing developments up to 330 feet of the Oregon NHT could potentially affect the ability to conform to agency policy of protecting archaeological sites. Stipulations for managing archeological sites as required by the National Historic Preservation Act should minimize this possibility. Selected EPMs (CR-1 through CR-8) would be aimed at reducing these impacts and construction would occur in a manner that would avoid disturbing important historic resources; however,

allowing ground disturbance in such proximity increases the potential for archaeological disturbance.

The amendment changing the VRM Class II classification to VRM Class III would change the classification of lands within 3,000 feet to the north of and including the existing transmission line. This may result in additional utilities being located along this route, which would result in additional impacts to resources managed under the MFP. A new transmission line would impact plants and wildlife as well as scenic and cultural resources. However, the disturbance would occur in a previously disturbed area.

The VRM Class II areas that would be reclassified under this amendment are also big game habitat. Impacts to big game would occur for both the construction and operations phases. Effects of these activities could result in avoidance of preferable forage, increased demand of energy resources in response to disturbance, temporary displacement from preferred habitat, resulting in possible increase in predation, reduced quality of forage, and impacts to reproduction.

The Segment 8 Revised Proposed Route would be within the viewshed of Kings Crown and the surrounding area north of King Hill. Scenery in this area is important to sensitive viewers such as visitors along the Oregon NHT. Existing high-voltage transmission lines and wind towers already interrupt the scenic quality in this area. The Segment 8 Revised Proposed Route would add to this interruption; however, it would avoid disrupting scenic quality in undisturbed areas. Additionally, EPMs such as using dull galvanized finish on lattice steel towers (VIS-1), using non-reflective finishes on subconductors and insulators (VIS-2 and VIS-9), as well as siting towers and access roads to reduce visual impacts (VIS-5 through VIS-7 and VIS-11) will minimize visual impacts.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the SEIS. Even with mitigation, however, the Project would result in impacts to visual resources and decrease protection of areas that have been designated as high visual resource areas. The presence of the Project through these areas would degrade this visual resource, and changing the VRM such that the Project is not in visual conflict with the land management objectives where it is located would result in a reduction of these VRM Class areas within the MFP Planning Area. This MFP change could also result in higher likelihood of placement of additional future lines through the same area, further reducing protection of historic resources and viewsheds in the surrounding area.

#### **3.4.5.2 Effects of Amendments for Routes not Associated with Co-Preferred Alternatives**

Alternatives 1 and 3 also include the Revised Proposed Route for Segment 8. The same amendments would be needed to this MFP under these Alternatives, and effects would be the same as those described for Co-Preferred Alternative 2. No other routes cross the Bennett Hills/Timmerman Hills Planning Area; therefore, no additional amendments would be needed for other Alternatives.

### 3.5 Kuna MFP Draft Amendment

The Kuna MFP,<sup>8</sup> approved on March 22, 1983, guides actions that occur within its Planning Area on lands managed by the Four Rivers Field Office, including the granting of ROW under Title V of FLPMA. The MFP confines new ROW to existing corridors, and has management requirements for visual and cultural resources. The Project would not be consistent with these requirements and thus is not consistent with the Kuna MFP. An amendment would be needed if any Alternative containing the Revised Proposed Route for Segment 8 is selected (i.e., Alternatives 1 through 3). Since the Co-Preferred Alternative 2 contains the route, an amendment is drafted for the Kuna MFP (see Table F-5)

**Table F-5.** Draft Amendment for the Kuna MFP

Affected Alternatives	Number	Affected Route	Existing MFP Direction	Draft Amendment
<b>Co-Preferred Alternative 2</b> Alternative 1 Alternative 3 Alternative 6 Alternative 7	SEIS-11	Revised Proposed 8, Revised Proposed 9/8H	L-4.1 – Confine major new utility R/Ws (i.e., 500 kV or larger or 24-inch pipeline) to existing corridors, as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses.	L-4.1 – Confine major new utility R/Ws (i.e., 500 kV or larger or 24-inch pipeline) to existing corridors as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses. <i>Amend Overlay L-4 to add a major transmission line (500 kV) right-of-way.</i>

#### 3.5.1 Purpose and Need to Amend the Kuna MFP

The Segment 8 Revised Proposed Route (Co-Preferred Alternative 2 and Alternatives 1 and 3) and a small portion of Segment 9 Revised Proposed Route/8H would cross through the Kuna Planning Area. The Kuna MFP includes management objectives for many resources including lands, minerals, range management, watershed, wildlife, visual, cultural, recreation, and transportation support. Management Actions being drafted for amendment are those for “Lands,” “Visual,” and “Cultural” resources. The route locations for the Project were developed to comply with WECC requirements and to protect resources to the greatest extent feasible.

Because the Project does not conform to the current direction provided in the Kuna MFP for cultural resources and following existing corridors, the land use plan would need to be amended if the Segment 8 Revised Proposed Route is selected. The planning regulations at 43 CFR 1601 provide a process to consider plan amendments for actions that are not in conformance with the plan.

The Segment 8 Revised Proposed Route would cross the Kuna MFP management area outside existing corridors. An amendment would be needed if the Segment 8 Revised Proposed Route is selected. Draft Amendment SEIS-11 addresses the Project’s

<sup>8</sup> BLM. 1983. Kuna Management Framework Plan. BLM Four Rivers Field Office, U.S. Department of Interior.

nonconformance with the management direction in the Kuna MFP. The Kuna MFP L-4.1 emphasizes the following with regard to utility ROWs:

“Confine major new utility R/Ws (i.e., 500KV or larger or 24-inch pipeline) to existing corridors, as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses.”

This amendment would also be needed for a small section of land crossed by the Segment 9 Revised Proposed Route/8H alignment, just south of the SRBOP.

The Segment 8 Revised Proposed Route would cross the Oregon Short Line Railroad within the Kuna MFP management area. An amendment to the Kuna MFP was evaluated for the 2013 FEIS routing through lands managed under Kuna MFP regarding the CRM 2.1 management direction for cultural resources. This management direction requires a ¼-mile corridor around the Union Pacific Railroad and management of specific historic sites for cultural resources. Further review determined that an amendment was not necessary for the effects of the Project action on this management direction.

### **3.5.2 Project Alternatives and Associated Routing**

The Segment 8 Revised Proposed Route follows the Proposed Route from the FEIS for the first 91.4 miles. The Segment 8 Revised Proposed Route is a single-circuit 500-kV transmission line that would link the Midpoint and Hemingway Substations.

Approximately 63 miles of the Segment 8 Revised Proposed Route are within the Kuna MFP boundaries. The transmission lines would be constructed utilizing 500-kV single-circuit lattice steel towers between 145 and 180 feet tall and would cross BLM-managed land covered by the Kuna MFP.

Several alternative segments, including the routes evaluated in the 2013 FEIS (Proposed Route, BLM-Preferred Route, and other routes) were considered. The Segment 8 Revised Proposed Route is described in Chapter 2 of the SEIS, along with the reasons for considering this route and other routes considered but not assessed in detail or previously assessed in the FEIS. Appendix A, Figure A-2 of the SEIS shows the Segment 8 Revised Proposed Route.

**Revised Proposed Route:** The Segment 8 Revised Proposed Route enters the Kuna MFP in Elmore County, southeast of Mountain Home, and proceeds in a general northwesterly direction, before heading through the SRBOP, paralleling an existing line. For much of this distance, the route follows the WWE corridor. Starting at MP 87.1, the route exits the WWE corridor and crosses VRM Class III and Class IV land in a west-northwesterly direction, to meet back up with and parallel the existing 500-kV line. The route would exit BLM-managed land in the Kuna MFP Planning Area near MP 99.7.

**Additional Routes:** A small section of land still managed under the Kuna MFP is crossed by the alignment for Segment 9 of the Revised Proposed Route/8H, just south of the SRBOP. Routes 8G, 9K, and FEIS Proposed 9 cross land south of the SRBOP. Routes 8H and 9K would cross through the southern portion of the SRBOP. These routes cross land managed under the SRBOP RMP and other management plans. No amendment would be needed to the Kuna MFP if an alternative including two of these routes is selected.

**No Action Alternative:** The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

### **3.5.3 Amendments to the Kuna MFP RMP Associated with the Co-Preferred Alternatives**

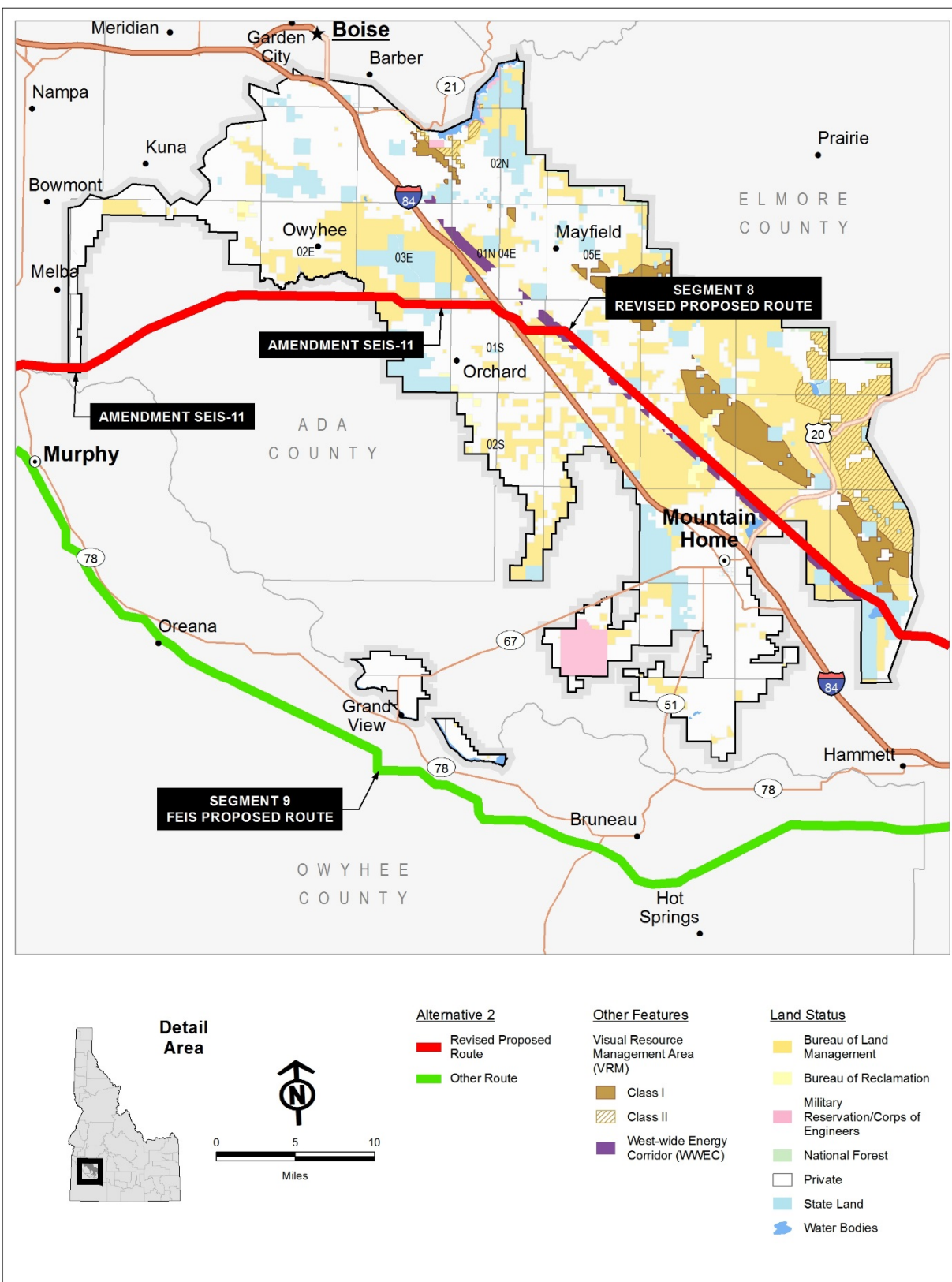
Co-Preferred Alternative 2 includes the Segment 8 Revised Proposed Route. The Segment 8 Revised Proposed Route would require a plan amendment to the Kuna MFP (Figure F-6). This draft amendment would allow the granting of a ROW for the Project across lands managed by the Four Rivers Field Office. The Kuna MFP limits new ROWs to existing corridors. This limitation would be rewritten to allow development of this Project. The intent of the amendment is to allow the current Project but not to create a corridor that would facilitate additional major utilities.

**Draft Amendment SEIS-11** for the Segment 8 Revised Proposed Route (for Co-Preferred Alternative 2) would amend the current Lands decision to permit the Project in this area. The amended decision (changes in italics) would read:

“L-4.1– Confine major new utility R/Ws (i.e., 500 KV or larger or 24-inch pipeline) to existing corridors as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses. *Amend Overlay L-4 to add a major transmission line (500-kV) right of way.*”

There is currently a management objective for managing cultural and historic ruins near the area for the Segment 8 Revised Proposed Route.





**Figure F-6.** Locations of Kuna MFP Amendment for Co-Preferred Alternative 2



### **3.5.4 Amendments Associated with Routing not included in the Co-Preferred Alternatives**

There are no additional amendments for routes that are not included for the Co-Preferred Alternative 2; however, for Alternatives 1, 6 and 7, the amendments would also apply to the Revised Proposed Route for Segment 9 and Route 8H (these two routes follow the same alignment through land managed under the Kuna MFP). Alternatives 1 and 3 also contain the Revised Proposed Route for Segment 8 and therefore the amendments discussed for Co-Preferred Alternative 2 apply.

### **3.5.5 Affected Environment and Environmental Effects**

The affected environment is discussed in Chapter 3 for each resource; Section 3.2.1 for visual resources, 3.3.1 for cultural resources, 3.6.1 for vegetation resources, 3.10.1 for wildlife resources, 3.11.1 for special status species, and 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Sections 3.2.2.2 and 3.2.2.3 for an analysis of the effects on visual resources; Sections 3.3.3.3 and 3.3.3.4 for effects on cultural resources; Sections 3.6.2.2 and 3.6.2.3 for effects on vegetation; Sections 3.10.2.2 and 3.10.2.3 for effects on wildlife; Sections 3.11.2.2 and 3.11.2.3 for effects on special status species; and Sections 3.17.2.2 and 3.17.2.3 for effects on land use and recreation.

The “Lands” amendment would allow the Project to conform to the Management Objective. Allowing the additional ROW placement, however, would not establish a new corridor, and new proposals for siting additional major utility lines would require a plan amendment, in addition to assessment under NEPA.

Allowing transmission lines outside the previously designated ROWs would mean that construction and operations impacts would occur outside these corridors. This includes impacts to wildlife, vegetation, soils, and cultural resources.

#### **3.5.5.1 Effects of Amendments for Routes Associated with the Co-Preferred Alternatives**

Within the Kuna RMP Planning Area, approximately 46 raptor nests are located within 1 mile of the Segment 8 Revised Proposed Route (excluding land managed under the SRBOP RMP); 23 of these are on BLM-managed land and include 21 ferruginous hawks and 2 golden eagles. All but four of these sightings occurred at, or adjacent to, existing powerlines. Impacts to raptors could include area avoidance, decreased hunting success, and nest abandonment due to disturbance. EPMs and BMPs following appropriate working and operations windows would limit these impacts.

Stream crossings would occur for the Segment 8 Revised Proposed Route. While impacts to fish could include increased siltation from culvert installation and decreased riparian cover, BMPs would be in place to minimize these impacts and correct improperly functioning culverts such that passage is not hindered. Specific EPMs for this Project include routine and corrective operations and maintenance activities in streams with sensitive fish species such as culvert installation, bank stabilization, and ford location throughout the year (OM-16). Culverts on BLM-administered land will be

designed to meet BLM Gold Book Standards (FISH-1). Riparian vegetation management will be conducted following EPMs such as OM-17, OM-19, and OM-20. In addition, water quality EPMs such as meeting National Pollutant Discharge Elimination System permit requirements (WQA-1, WQA-2, and WQA-3) and following Stormwater Pollution Prevention Plans and BMPs (WQA-4 through WQA-12) will avoid and minimize impacts to water resources.

The soils for Segment 8 are generally susceptible to erosion with a low tolerance to soil loss. Impacts from the Project include compaction, as well as soil loss due to wind and water erosion. Detrimental soil disturbance such as compaction, erosion, puddling, and displacement will be minimized through implementing measures identified in the Stormwater Pollution Prevention Plan (SOIL-4).

Cultural impacts from allowing the Project to cross outside of established corridors could include impacts to the sense of place and historic character of the railroad. EPMs (CR-1 through CR-8) would be aimed at reducing these impacts and construction would occur in a manner that would avoid disturbing important historic resources. Possible impacts include presence of a structure not in keeping with the historic nature of the site, disturbance of land containing culturally important artifacts or landscape features, as well as noise and construction disturbance during construction, decommissioning, and repair and maintenance.

Mitigation measures designed to reduce adverse impacts are summarized in Table 2.7-1 of the FEIS.

### **3.5.5.2 Effects of Amendments for Routes not Associated with Co-Preferred Alternatives**

Alternatives 1 and 3 also include the Revised Proposed Route for Segment 8. The same amendments would be needed to this MFP under these Alternatives, and effects would be the same as those described for Co-Preferred Alternative 2. The alignment for the Segment 9 Revised Proposed Route and Route 8H also crosses a small parcel still managed under the Kuna MFP. This is a very small parcel of land and therefore effects described for Segment 8 are likely overstating the impact. Allowing the transmission line in this location would, however, essentially result in the land-use for the parcel that is crossed being a ROW, as the parcel is quite small (see Figure F-6).

## **3.6 Bruneau MFP Draft Amendments**

Actions that occur on lands managed by the Bruneau Field Office, including the granting of ROW under Title V of FLPMA, are guided by decisions recorded in the Bruneau MFP.<sup>9</sup> The 8G, 9K, and FEIS Proposed 9 routes would cross through the Bruneau Planning Area. The Bruneau MFP includes management objectives for visual resources.

Both Co-Preferred Alternatives would require an amendment to the Bruneau MFP where the FEIS Proposed 9 (Alternative 2) or 8G and 9K (Alternative 5) routes cross VRM Class II designated land. Alternative 3 (Route 9K), Alternative 4 (Route 8G and

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<sup>9</sup> BLM. 1983. Bruneau Management Framework Plan.

FEIS Proposed 9), Alternative 6 (FEIS Proposed 9), and Alternative 7 (Route 9K) would also require a plan amendment to the Bruneau MFP (see Table F-6). An amendment is drafted for FEIS Proposed 9 for Co-Preferred Alternative 2 (see Figure F-7a) and for Routes 8G and 9K for Co-Preferred Alternative 5 (see Figure F-7b)

No amendments to the Bruneau MFP are currently suggested for the Segment 9 Revised Proposed Route (Alternative 1) or Route 8H (Alternatives 6 and 7), which follow the same alignment, along an existing transmission line through the SRBOP for the majority of the routing in this area.

**Table F-6.** Draft Amendment for the Bruneau MFP

Affected Alternatives	Number	Affected Routes	Existing MFP Direction	Draft Amendment
Co-Preferred Alternative 2	SEIS-12	FEIS Proposed 9/ 8G/9K	VRM-1.2: Designate 136,000 acres as VRM Class II where activities are designed and located to blend into the natural landscape and not visually apparent to the casual visitor	The area designated as VRM Class II adjacent to Castle Creek will be reclassified to VRM Class III.
Co-Preferred Alternative 5				
Alternative 3				
Alternative 4				
Alternative 6				
Alternative 7				

### 3.6.1 Purpose and Need to Amend the Bruneau MFP

As stated above, both of the Co-Preferred Alternatives contain routes that would cross the Bruneau Planning Area and would cross VRM Class II managed lands. This action would not conform to VRM Class II management objectives, and therefore an amendment would be required to reclassify this area. Route 8G, Route 9K, and FEIS Proposed 9 would cross the Planning Area and would cross VRM Class II lands near Castle Creek.

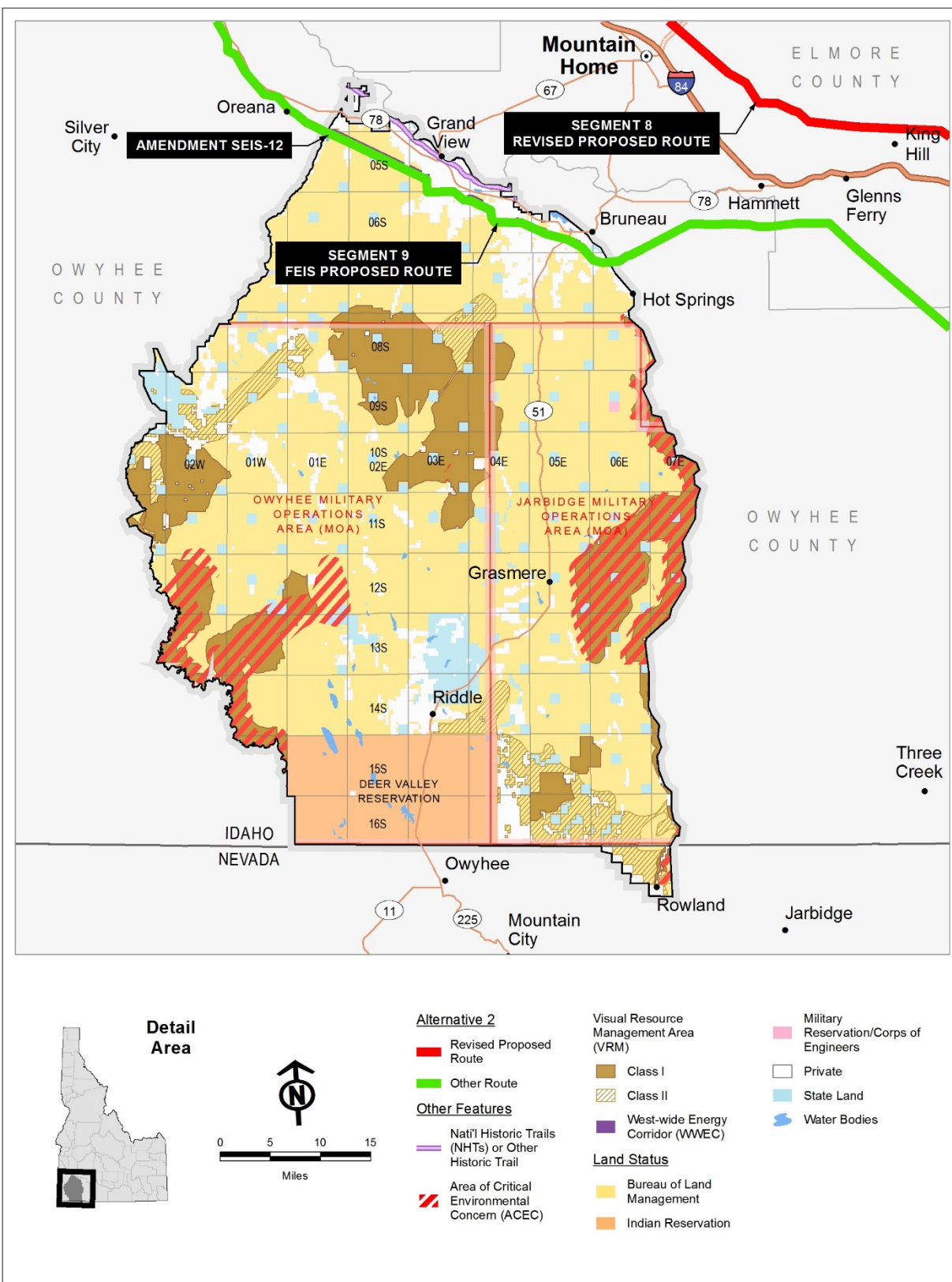
The Segment 9 Revised Proposed Route would cross a very small portion of land managed under the Bruneau MFP. Crossing this area would be consistent with the management objectives and therefore no amendment to the Bruneau MFP would be needed for this alignment.

This action would not conform to VRM Class II management objectives, and therefore an amendment would be required to reclassify this area.

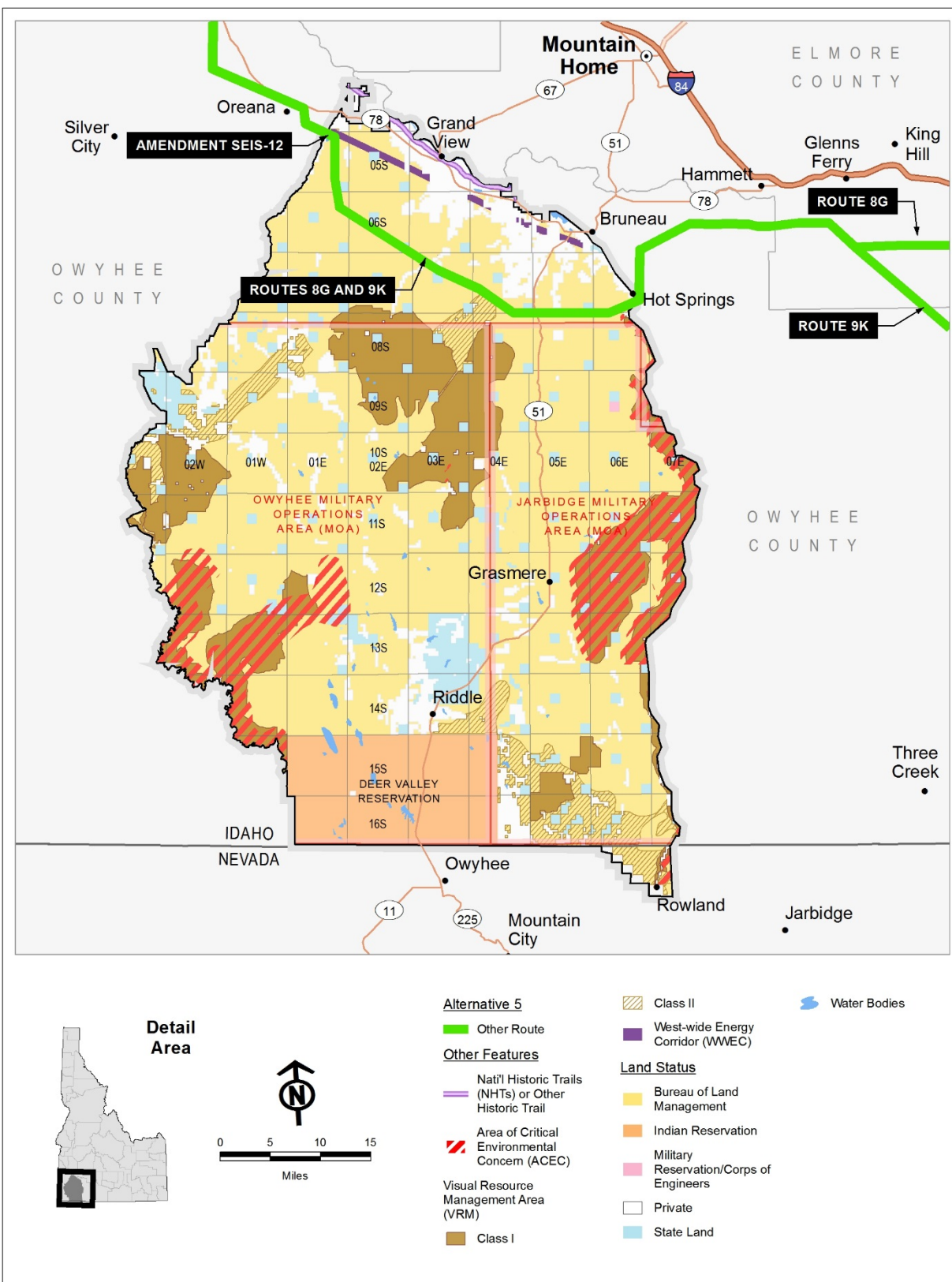
### 3.6.2 Project Alternatives and Associated Routes

Portions of the Segment 9 Revised Proposed Route and Route 8H (Alternatives 1, 6, and 7) would cross through the Bruneau MFP Planning Area for less than a mile. In comparison, over 30 miles of the 8G, 9K, and FEIS Proposed 9 would cross through the Planning Area.

These routes are described in Chapter 2 of the SEIS, along with the reasons for considering these routes and other routes considered but not assessed in detail or previously assessed in the FEIS. Appendix A, Figure A-4 of the SEIS shows the Segment 9 Revised Proposed Route.



**Figure F-7a.** Location of Bruneau MFP Amendment for Co-Preferred Alternative 2



**Figure F-7b.** Location of Bruneau MFP Amendment for Co-Preferred Alternative 5

**Segment 9 Revised Proposed Route/Route 8H:** The Segment 9 Revised Proposed Route and Route 8H cross approximately 0.8 mile of the Bruneau Planning Area north of the town of Bruneau. This alignment crosses the SRBOP RMP Planning Area, north of the Bruneau Field Office.

**Additional Routes:**

*Routes 8G and 9K (Co-Preferred Alternative 5):* Under Co-Preferred Alternative 5, Routes 8G and 9K enter the Bruneau Planning Area south of Bruneau and Hot Springs. The alignments would parallel each other and follow a westerly then northwesterly direction, leaving the Bruneau Planning Area at Castle Creek.

*Route 8G (Alternative 4):* Under Alternative 4, Route 8G would not parallel another line and would cross the Bruneau Planning area as a single 500-kV line. The route alignment would be the same, leaving the Bruneau Planning Area at Castle Creek.

*Route 9K (Alternatives 3 and 7):* Under Alternatives 3 and 7, Route 9K would not parallel another line and would cross the Bruneau Planning area as a single 500-kV line. The route alignment would be the same, leaving the Bruneau Planning Area at Castle Creek.

*FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6):* The FEIS Proposed 9 route enters into the Bruneau Management Area between Bruneau and Hot Spring. The route proceeds in a northwesterly direction, generally paralleling the FEIS BLM-Preferred Route. The majority of the FEIS Proposed 9 follows the WWE corridor, crossing both public and private lands and leaving the Bruneau Planning Area at Castle Creek.

These routes were developed to avoid the majority of the SRBOP. In addition, siting was located to minimize Project impacts on private land, the routes being located primarily on BLM-managed land. These routes are outside the WWE corridor, cross crucial big game management range, and are located to avoid Greater sage-grouse leks. Selection of both routes (as would be the case under Co-Preferred Alternative 5) would not meet the Proponents' goal of redundancy, but provides an alternative that avoids much of the SRBOP.

**No Action Alternative:** The No Action Alternative analyzed in the SEIS is the predicted result of the denial of the applications. Under the No Action Alternative, Gateway West would not be constructed (no construction of the new substations, substation expansion, or the transmission line); therefore, no associated plan amendments would be required. The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs (as described in SEIS Section 1.4, Proponents' Objectives for the Project), would not be met.

### **3.6.3 Amendments to the Bruneau MFP Associated with the Co-Preferred Alternatives**

An amendment would be required for Alternatives 2 through 7. This amendment would apply to the FEIS Proposed 9, 8G, and 9K routes. This amendment is drafted for both Co-Preferred Alternatives 2 and 5. The Bruneau MFP currently restricts impacts to

visual resources. Routes 8G, 9K, and FEIS Proposed 9 would cross an area of approximately 281 acres just south of the WWE corridor classified as VRM Class II for 0.3, 0.4, and 0.1 mile, respectively; therefore, an amendment to the MFP to allow impacts to visual resources would be needed if any of these routes is selected.

The Bruneau MFP emphasizes the following with regard to visual resources:

- **VISL Objective #1:** Manage all public lands in a manner which will protect and maintain the existing visual qualities, provide for enhancement where consistent with management policies, and provide for rehabilitation of land which presently do not meet the visual quality standards of surrounding lands. Use VRM contrast rating and project application design process for all management activities without unduly reducing commodity production or limiting program effectiveness.
- **VRM-1.2:** Designate 136,000 acres as VRM Class II where activities are designed and located to blend into the natural landscape and not visually apparent to the casual visitor.

Route 8G, Route 9K, and FEIS Proposed 9 would cross a parcel designated as VRM Class II near Castle Creek. The recently completed Visual Resources Inventory recognizes this parcel as VRM Class III for inventory purposes. With these factors in mind, the visual resource restrictions would be rewritten to reclassify the area.

**Draft Amendment SEIS-12** for Route 8G, Route 9K, and FEIS Proposed 9 would amend this MFP. The amended restriction for visual resource impacts (changes in italics) would read:

*The area designated as VRM Class II adjacent to Castle Creek will be reclassified to VRM Class III.*

This would reduce the area managed as VRM Class II by approximately 281 acres. The purpose of the amendment would be to modify the visual restrictions, such that the granting of a ROW for construction of the Project would be in conformance with the Bruneau MFP.

### **3.6.4 Amendments to the Bruneau MFP Not Included in the Co-Preferred Alternatives**

Alternatives 3, 4, 6, and 7 all contain routes that would cross through the Bruneau MFP Planning Area and require an amendment to change the VRM Classification. This amendment is the same as the amendment for the Co-Preferred Alternatives, discussed above. There are no amendments to the Bruneau MFP associated with the Segment 8 Revised Proposed Route or Segment 9 Revised Proposed Route/Route 8H.

### **3.6.5 Affected Environment and Environmental Effects**

The affected environment is discussed in Chapter 3 for each resource: Section 3.2.1 for visual resources, Section 3.3.1 for cultural resources, Section 3.6.1 for vegetation resources, Section 3.10.1 for wildlife resources, Section 3.11.1 for special status species, and Section 3.17.1 for recreation and land use.

The direct and indirect effects of this Project are discussed in Chapter 3 of the SEIS. Cumulative effects are discussed in Chapter 4. Refer to Section 3.2.2 and Appendix G



for an analysis of the effects on visual resources; Sections 3.3.3 and Appendix J, Section 6.2 for effects on cultural resources; Section 3.6.2 for effects on vegetation; Section 3.10.2 for effects on wildlife; Section 3.11.2 for effects on special status species; and Section 3.17.2 for effects on land use and recreation. The following effects are similar to those discussed in the FEIS because the routing is similar to Route 9E in the 2013 FEIS.

#### **3.6.5.1 Effects of Amendments Associated with the Co-Preferred Alternatives**

Reclassifying the VRM Class II parcel to VRM Class III would allow the transmission line to conform to the Bruneau MFP. More than half of the area of this parcel is within the WWE corridor. The routing for Segment 9 of the Co-Preferred Alternative 2 (FEIS Proposed 9) through this area is within the WWE corridor, while Routes 8G and 9K (Co-Preferred Alternative 5) are just south of the corridor. Reclassifying this parcel to VRM Class III would facilitate siting additional transmission lines in the WWE corridor, which would add to cumulative effects in the area. Indeed, selection of Co-Preferred Alternative 5 would result in two parallel 500-kV transmission lines within the reclassified parcel, which would have a greater visual effect than Co-Preferred Alternative 2 or any of the other Alternatives crossing the parcel. This Alternative does, however, avoid most of the impacts to the SRBOP.

The direct effects of amending the MFP to allow the Project include the disruption of form, line, texture, and color of the existing landscape. Construction and operations of a high-voltage transmission line would impact wildlife and other resources as described in the SEIS. Discussion with the BLM Bruneau Field Office personnel and a review of the 2012 Visual Resource Inventory indicated that it was felt this area was considered to have the visual resource qualities consistent with VRM Class III. This amendment would therefore be consistent with VISL Objective #1, but would reduce the VRM Class II designation in VRM-1.2. This reduction would be necessary because managing for a transmission line would not conform to VRM Class II management objectives. The presence of one or two high-powered transmission lines would not blend into the natural landscape and would be apparent to the casual observer (see Appendix G for a discussion of the visual impacts).

However, following the guidance of Objective #1, the re-evaluation of visual resources that was conducted in the 2012 Visual Resource Inventory indicates reclassifying this land to VRM Class III would still meet the objective of using VRM contrast ratings for management activities.

#### **3.6.5.2 Effects of Amendments for Routes not Associated with the Co-Preferred Alternatives**

Routing for Alternatives 3, 4, 6, and 7 results in the same amendment to the Bruneau MFP being needed, as is discussed above for the Co-Preferred Alternatives. Therefore the effects of this amendment would be similar to those discussed above. The direct effect from the Project of reclassifying the Class II area near Castle Creek to VRM Class III would differ across the routes, however, as different routes would be constructed, depending on the action alternative selected. Under Co-Preferred Alternative 2, and Alternatives 3, 6, and 7, only one Project route would be constructed through this area as a result of the amendment. Under Co-Preferred Alternative 5 and Alternative 4, two



routes would be constructed. In Alternative 4, this would result in one route in the WWE corridor and one route south of the corridor. In Co-Preferred Alternative 5, this would result in two routes being constructed 250 feet apart, just south of the WWE corridor.

**Appendix G**  
**VRM Amendment Analysis**

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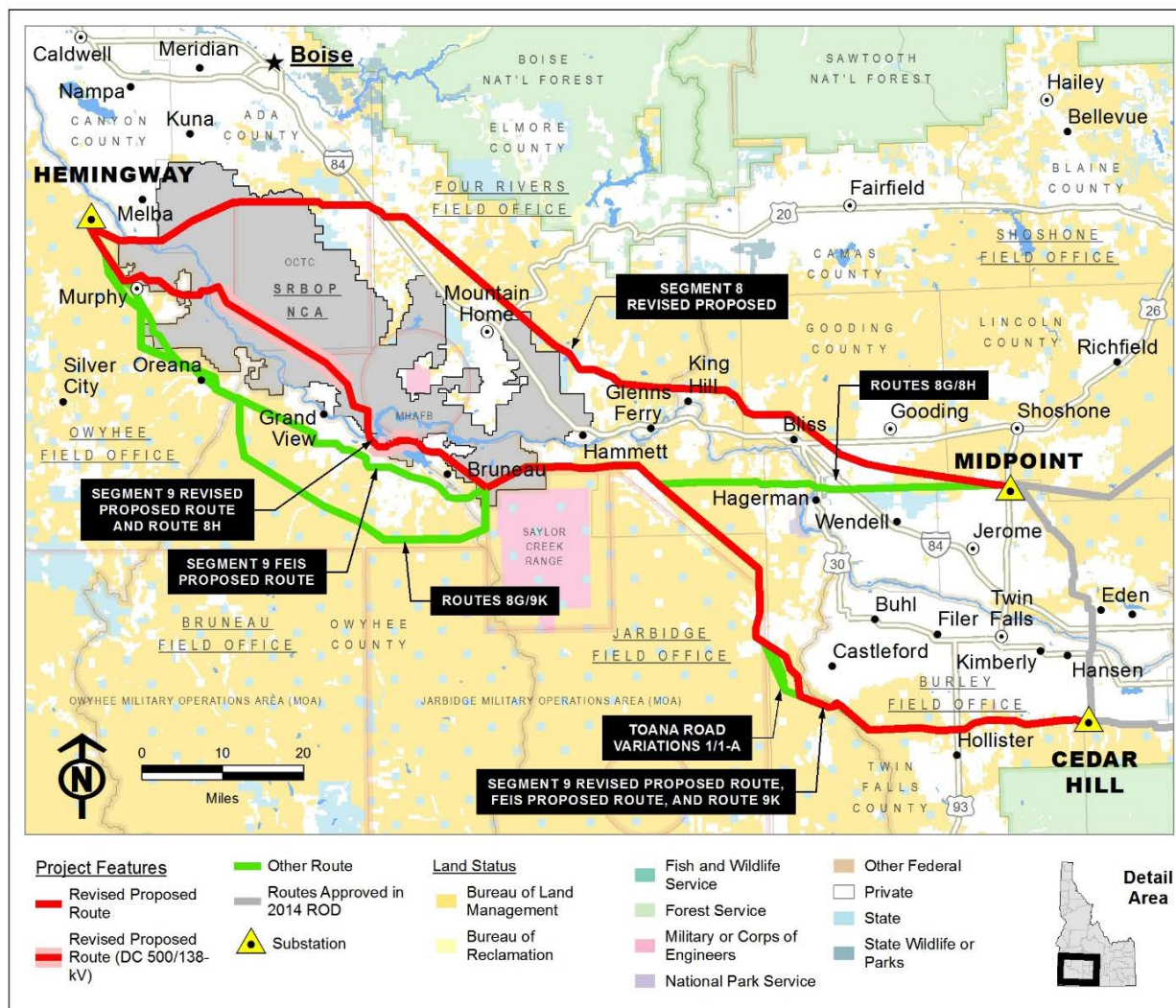
## ACRONYMS AND ABBREVIATIONS

ACEC	area of critical environmental concern
AOI	area of inconsistency
BLM	Bureau of Land Management
FEIS	Final Environmental Impact Statement
Gateway West	Gateway West Transmission Line Project
GIS	geographic information system
IDT	Interdisciplinary Team
KOP	Key Observation Point
kV	kilovolt
LRT	Linear Routing Tool
MEP	Mitigation and Enhancement Portfolio
MFP	management framework plan
MP	milepost
NHT	National Historic Trail
ORV	outstandingly remarkable value
Project	Gateway West Transmission Line Project
Proponents	Rocky Mountain Power and Idaho Power
RMP	resource management plan
ROW	right-of-way
SEIS	Supplemental Environmental Impact Statement
SR	State Route
SRBOP	Morley Nelson Snake River Birds of Prey National Conservation Area
SRMA	Special Recreation Management Area
US	U.S. Highway
VCR	visual contrast rating
VR	Visual Resource Inventory
VRM	Visual Resource Management
WSA	Wilderness Study Area
WSR	Wild and Scenic River
WWE	West-wide Energy

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## 1 INTRODUCTION

This document provides an analysis of locations where visual resource management-driven amendments to Bureau of Land Management (BLM) resource management plans (RMPs) and/or management framework plans (MFPs) may be necessary for additional routing options for Segments 8 and 9 of the Gateway West Transmission Line Project (Gateway West or Project) discussed in the Supplemental Environmental Impact Statement (SEIS). Gateway West consists of 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. This document reviews routing for Segments 8 and 9 (both in Idaho) as developed for the SEIS (see Figure 1-1).



**Figure 1-1.** Project Overview

The transmission line would cross several BLM district and field offices. Activities on BLM-managed land are governed by direction found in individual RMPs and MFPs. These lands are subject to visual resource management objectives as developed using the BLM Visual Resource Management (VRM) System (BLM 1984) and are presented

in the RMP or MFP. The BLM system identifies four VRM Classes (I through IV) with specific management prescriptions for each class. The system is based on an inventory of the existing scenic quality, viewer sensitivity, and viewing distance zones. The management class for a given area is typically arrived at by comparing the scenic quality, visual sensitivity, and distance zone with the overall goals set forth for the area. The objectives of each VRM classification from the VRM Visual Resource Inventory Manual are stated below:

- VRM Class I. The objective is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention.
- VRM Class II. The objective is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.
- VRM Class III. The objective is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate or lower. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.
- VRM Class IV. The objective is to provide for management activities that require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements.

The VRM classifications are assigned after a Visual Resource Inventory (VRI) has been conducted of the area. VRI information is presented for each area of inconsistency (AOI) where information was available. The following description is taken from BLM Manual H-8410-1 (BLM 1986a):

*The visual resource inventory process provides BLM managers with a means for determining visual values. The inventory consists of a scenic quality evaluation, sensitivity level analysis, and a delineation of distance zones. Based on these three factors, BLM-administered lands are placed into one of four visual resource inventory classes. These inventory classes represent the relative value of the visual resources. Classes I and II being the most valued, Class III representing a moderate value, and Class IV being of least value. The inventory classes provide the basis for considering visual values in the resource management planning (RMP) process...*

*...Scenic quality is a measure of the visual appeal of a tract of land. In the visual resource inventory process, public lands are given an A, B, or C rating based on the apparent scenic quality which is determined using seven key factors: landform, vegetation, water, color, adjacent scenery, scarcity, and cultural modifications...*



*...The planning area is subdivided into scenic quality rating units for rating purposes. Rating areas are delineated on a basis of: like physiographic characteristics; similar visual patterns, texture, color, variety, etc.; and areas which have similar impacts from man-made modifications...*

*...Visual resource classes are categories assigned to public lands, which serves two purposes: (1) an inventory tool that portrays the relative value of the visual resources, and (2) a management tool that portrays the visual management objectives. There are four classes (I, II, III, and IV). ... Visual resource inventory classes are assigned through the inventory process. Class I is assigned to those areas where a management decision has been made previously to maintain a natural landscape. This includes areas such as national wilderness areas, the wild section of national wild and scenic rivers, and other congressionally and administratively designated areas where decisions have been made to preserve a natural landscape. Classes II, III, and IV are assigned based on a combination of scenic quality, sensitivity level, and distance zones. ... Inventory classes are informational in nature and provide the basis for considering visual values in the RMP process. They do not establish management direction and should not be used as a basis for constraining or limiting surface disturbing activities.*

The presence of a transmission line in VRM Classes I and II areas usually does not conform to visual management objectives. Areas where this occurs are identified as AOIs.

Best Management Practices for tower design and location were applied to reduce plan inconsistency as much as possible. This report describes each of the AOIs and explains why the VRM Class I and Class II area would be crossed and what consideration was given to avoiding the area. The type of amendment required, should routing in a co-preferred alternative or other alternative be selected, is then discussed. The analysis is provided in this appendix to meet the documentation requirements of the RMP. Maps showing the distribution of VRM classes within RMP and MFP boundaries are shown in Section 5.

## **2 PROJECT FEATURES AFFECTING VISUAL ENVIRONMENT**


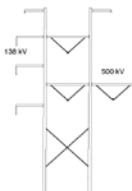
### **2.1 Facility Components**

The Project facility components that affect the visual environment include:

- Two transmission line segments, their associated access roads, multipurpose and helicopter fly yards, and other temporary construction ground disturbances;
- Proposed substation and expansions or modifications at two existing substations and at one substation approved under the 2013 Record of Decision, and removal of one small existing substation;
- Relocation of portions of an existing 138-kV line;
- Other associated facilities including communication systems and optical fiber regeneration stations; and
- Access roads and distribution supply lines where needed for proposed substations and optical fiber regeneration stations.

Details of construction and operation activities are described in the Plan of Development Supplement included as Appendix B to the Draft SEIS. The August 2014 Draft Mitigation and Enhancement Portfolio Proposal (MEP) submitted by Rocky Mountain Power and Idaho Power (the Proponents) is part of the Proposed Action and is included in Appendix C of the Draft SEIS. Environmental protection plans are included as appendices to the August 2013 Plan of Development. All of these plans are considered part of the Project description for the proposed Project. Table 2.1-1 describes aspects of the primary proposed structures that would affect the visual environment.

**Table 2.1-1. Primary Transmission Structures – Visual Description**

Project Facility	Description
<b>Transmission Line Segments</b>	
<p>Transmission Line Features Common to All Proposed 500-kV Segments</p>  <p>Example single-circuit structure</p>	<ul style="list-style-type: none"> <li>• Conductors: Bundled with three subconductors per phase. Non-specular (dull) finish rather than a shiny finish.</li> <li>• Estimated subconductor diameter: 1.504 inches.</li> <li>• Bundle spacing: Distance between subconductors is 18 inches and 25 inches.</li> <li>• Non-reflective, non-refractive insulators.</li> <li>• Typical ground clearance: 35 feet.</li> <li>• Structure types: lattice steel single- and double-circuit structures. Dull galvanized steel finish.</li> <li>• Structure heights: Single-circuit structure varies between 145 and 180 feet. Average height of 156 feet.</li> <li>• Approximate distance between structures: 1,200 to 1,300 feet.</li> <li>• Right-of-way (ROW) width: 250 feet.</li> </ul>
<p>Proposed Double-Circuit 138/500-kV Structure (Revised Proposed – Segment 9/8H)</p>  <p>Example double-circuit structure</p>	<ul style="list-style-type: none"> <li>• 500-kV Conductor: Bundled with three subconductors per phase. Non-specular (dull) finish rather than a shiny finish.</li> <li>• Estimated subconductor diameter: 1.51 inches.</li> <li>• 500-kV Bundle spacing: Distance between subconductors is 18 inches and 25 inches.</li> <li>• 138-kV Conductor: Single aluminum conductor steel reinforced. Estimated subconductor diameter: 1.05 inches.</li> <li>• Non-reflective, non-refractive insulators.</li> <li>• Minimum ground clearance: <ul style="list-style-type: none"> <li>- 138-kV: 24 feet</li> <li>- 500-kV: 35 feet</li> </ul> </li> <li>• Structure types: double-circuit steel H-frame structures, dull galvanized or self-weathering steel.</li> <li>• Structure heights: varies between 125 and 200 feet.</li> <li>• Approximate distance between structures: 900 to 1,200 feet.</li> <li>• ROW width: 250 feet.</li> </ul>

## 2.2 Project-wide Visual Mitigation Measures Proposed by the Proponents

The Proponents have incorporated three mitigation measures into the Project to reduce visual impacts:

1. Transmission towers would be constructed of dull galvanized steel to minimize visual impacts.
2. Non-specular (dull appearance) transmission line conductors would be used.

### 3 STUDY ASSUMPTIONS

The Interdisciplinary Team (IDT) assumed that BLM land use plan amendments would be required for AOIs. The IDT also assumed that design elements and/or other mitigation measures that reduce impacts would not always reduce the visual contrast to a level that conformed to an area's VRM class.

For the purpose of this study, the following approaches were used:

- The location of a route across VRM Class III is consistent with the class objectives if consideration was given to route alignments that would avoid the area and feasible mitigation was applied. It was determined that the Revised Proposed Routes and the other routes considered in this Draft SEIS would comply with VRM Class III; however, additional existing condition influences resulted in one instance of changing the VRM to Class IV.
- Direction for considering visual resource values stated in RMPs and MFPs were taken into consideration. Where absent or general in nature, the management direction provided in BLM Handbook H-1601-1, *Land Use Planning*, was considered (BLM 2005).
- The AOI analysis area consisted of up to 15 miles from either side of the centerline of the Project routes.

### 4 PROJECT-WIDE ALTERNATIVES DEVELOPMENT

During transmission line siting, VRM Class I and Class II lands were avoided where possible. The routes were also sited to avoid historic trails (where possible) and monuments, wildlife refuges, state or federal parks or monuments, prominent peaks, and populated areas and a variety of natural resources including raptor nests, sage-grouse leks, and core areas. The objective was to have the least overall impact.

The following text lists the steps that were taken to develop the routing considered in the two Co-Preferred Alternatives (Alternatives 2 and 5) and other five Alternatives considered in the SEIS.

Constraint analyses have been used for the Project to assist in siting the transmission line routes and alternatives. In the initial phase, the Proponents attempted to locate the routes between required interconnection points (substations) using a comprehensive set of avoidance and opportunity criteria. Using this information, the Proponents initially identified, evaluated, and compared corridors for each of the 10 segments. A Proposed Route was selected and corridors for additional routes were also evaluated for each segment.

Two general approaches were used to identify and evaluate various routes and select the Proposed Route and other routes carried forward for detailed study for each segment.

1. In proposed and established utility corridors<sup>1</sup> such as the Section 368 Energy Act West-wide Energy (WWE) corridor (DOE and BLM 2008) or BLM-designated utility corridors, and/or where existing transmission lines exist, analyses were completed to characterize the resources present in the areas crossed by the corridors and to determine if use of such corridors would result in significant environmental effects. A combination of constraint mapping, stakeholder input, and field reconnaissance was used to confirm the use of existing or planned corridors. In several cases, new routes deviating from the existing or planned corridors were proposed because of adjacent environmental constraints such as sage-grouse leks, historic features, and raptor nests.
2. Where no existing or planned corridors existed, a “Greenfield” siting approach was followed.<sup>2</sup> In those cases, a geographic information system (GIS) computer analysis (Linear Routing Tool [LRT]) was used to identify initial corridors for further evaluation. Using data from numerous public sources, the LRT was used to develop alternate transmission line corridors by considering both routing constraints and opportunities. Constraints are defined as resources or conditions that may be negatively affected by transmission line routing. Opportunities are defined as resources or conditions that are favorable to facility construction or operation because of their characteristics.

Opportunities included, but were not limited to, WWE corridors, BLM-designated utility corridors, and existing transmission lines. Many constraints were considered. These included railroads, pipelines, highways, state and national parks, wildlife refuges, BLM areas of critical environmental concern (ACECs), wilderness study areas (WSAs), Department of Defense land, Bureau of Indian Affairs land and reservations, prime farmland, irrigated agriculture, confined animal feeding operations, dairies, airports, residences, cities and towns, oil and gas wells, surface and underground mining, erodible soils, geologic hazards, steep slopes, paleontological and historical resources, wetlands and floodplains. A wide variety of plant and animal concerns were also considered, including plant and animal species of concern, sage-grouse leks and core areas, raptor nests, crucial big game winter and parturition ranges, wild horse and burro management areas, and sensitive fisheries. Visual considerations included BLM VRM Class I, II, and III areas; scenic overlooks; scenic highways; federally designated scenic areas; and state and local scenic byways. Following selection of proposed and other routes via the LRT process, the routes were further refined by reviewing aerial photography and topographic

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<sup>1</sup> In order to achieve the capacity rating needed to serve present and future loads within the Proponents’ service area, the Western Electricity Coordinating Council requires a minimum separation from existing transmission lines that serve substantially the same load as that served by each of the new Gateway West transmission segments. As described in Chapter 1 of the environmental impact statement, that minimum separation depends on the purpose of the existing line, the load it now serves, and the remaining capacity of the rest of the grid to absorb the load if the several co-located lines fail at once. For the purposes of the initial siting study, the longest span was assumed to be 1,500 feet, thereby dictating the minimum distance between existing and proposed transmission lines serving the same load.

<sup>2</sup> “Greenfield route” is a route that would be located away from linear corridors, thereby creating a new land use.

maps or on the basis of important input received from stakeholders, field reconnaissance, and other sources.

The BLM evaluated the initial routes, made adjustments, and added additional routes to minimize impacts. Later cooperators and other stakeholders identified routes, often to accomplish a dominant objective based on a single resource such as agriculture or historic sites over other resources including VRM classes. Following the 2013 Record of Decision, the BLM convened a Resource Advisory Committee to consider additional options in Segments 8 and 9. After considerable review, the BLM came up with two Co-Preferred Alternatives that incorporate specific routing options for Segments 8 and 9, and 5 additional Alternatives incorporating combinations of routing for Segments 8 and 9. Refer to Chapter 2 of the Draft SEIS for a discussion of this process. Taking all of the various constraints and opportunities into consideration, crossing of VRM sensitive lands could not be avoided throughout the Project. Section 5 of this report describes each AOI and identified proposed land use plan amendments for the Project to conform to the applicable land use plan.

## **5 AREAS OF INCONSISTENCY**

This section of the report summarizes the conditions for each AOI. It is organized by RMP or MFP from east to west by route segment and by individual AOI. Analyses of the routes not being addressed in the SEIS were presented in the Final Environmental Impact Statement (FEIS). The description for each AOI includes a summary of the applicable BLM land use plan and any visual considerations described in the plan. The route segments and alternatives are then described by location and the rationale provided for why routes could not avoid VRM Class I and II areas. The general discussion is followed by a summary of the existing landscape conditions within the study area.

Site maps are included that show VRM classes and a visual analysis conducted for an area within a 15-mile radius of the AOI. Viewshed analyses were run using 180-foot transmission structures. Actual tower heights will vary depending on topography and other design considerations. The range for tower height discussed in Chapter 2 of the SEIS is between 125 and 200 feet. The intent of the viewshed analyses is to provide an indication of areas that could potentially have a view of the Project in the AOIs.

The last section of each AOI discussion is a consistency analysis describing the results of the analysis, and the degree to which the AOI conforms or differs from the VRM class objective. Included in some AOIs are photographic simulations of the Project, showing how the Project would appear within the landscape. A detailed description of the method for these simulations is provided in Section 3.2 of the FEIS. The analysis also describes proposed plan amendments for the AOIs that do not conform to existing land use plans.

The routes associated with the Co-Preferred Alternatives and with other Alternatives for the Project would require BLM actions to account for visual impacts in the planning areas under five different BLM land use plans. Affected land use plans include the Twin Falls MFP, 1987 Jarbidge RMP, Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) RMP, Bennett Hills/Timmerman Hills MFP, and Bruneau

MFP. The Project would be in conformance with the 2015 Jarbidge RMP; therefore, some of the amendments for routes analyzed in the 2013 FEIS would no longer apply. Segments 8 and 9 contain a total of seven AOIs.

Table 5-1 lists AOIs by RMP/MFP and VRM class. Figure 5-1 is an overview map showing AOIs Project-wide.

**Table 5-1.** BLM RMP and MFP Areas of Inconsistency

Land Use Plan	AOI Designation	Area Name	Route Designation (Maximum Transmission Structure Height)	VRM Class Crossed
Twin Falls MFP	TF-1	Salmon Falls Creek	Revised Proposed 9 (180 feet) Route 9K FEIS Proposed 9	I and II
1987 Jarbidge RMP	J-5	North Oregon Trail	Revised Proposed 8 (180 feet)	I
SRBOP RMP/ 1987 Jarbidge RMP	BOP-1/J-3	South Oregon Trail	Revised Proposed 9/8H (180 feet)	II
SRBOP RMP	BOP-2	Sinker Butte	Revised Proposed 9/8H (180 feet)	II
	BOP-3	Guffey Butte	Revised Proposed 9/8H (180 feet)	II
Bennett Hills/ Timmerman Hills MFP	BH-1	Burnt Ridge	Proposed 8 (180 feet)	II
Bruneau MFP	B-1	Castle Creek	Routes 8G, 9K, FEIS Proposed 9	II

AOI – Area of Inconsistency; MFP – Management Framework Plan; RMP – Resource Management Plan; SRBOP – Morley Nelson Snake River Birds of Prey National Conservation Area; VRM – Visual Resource Management



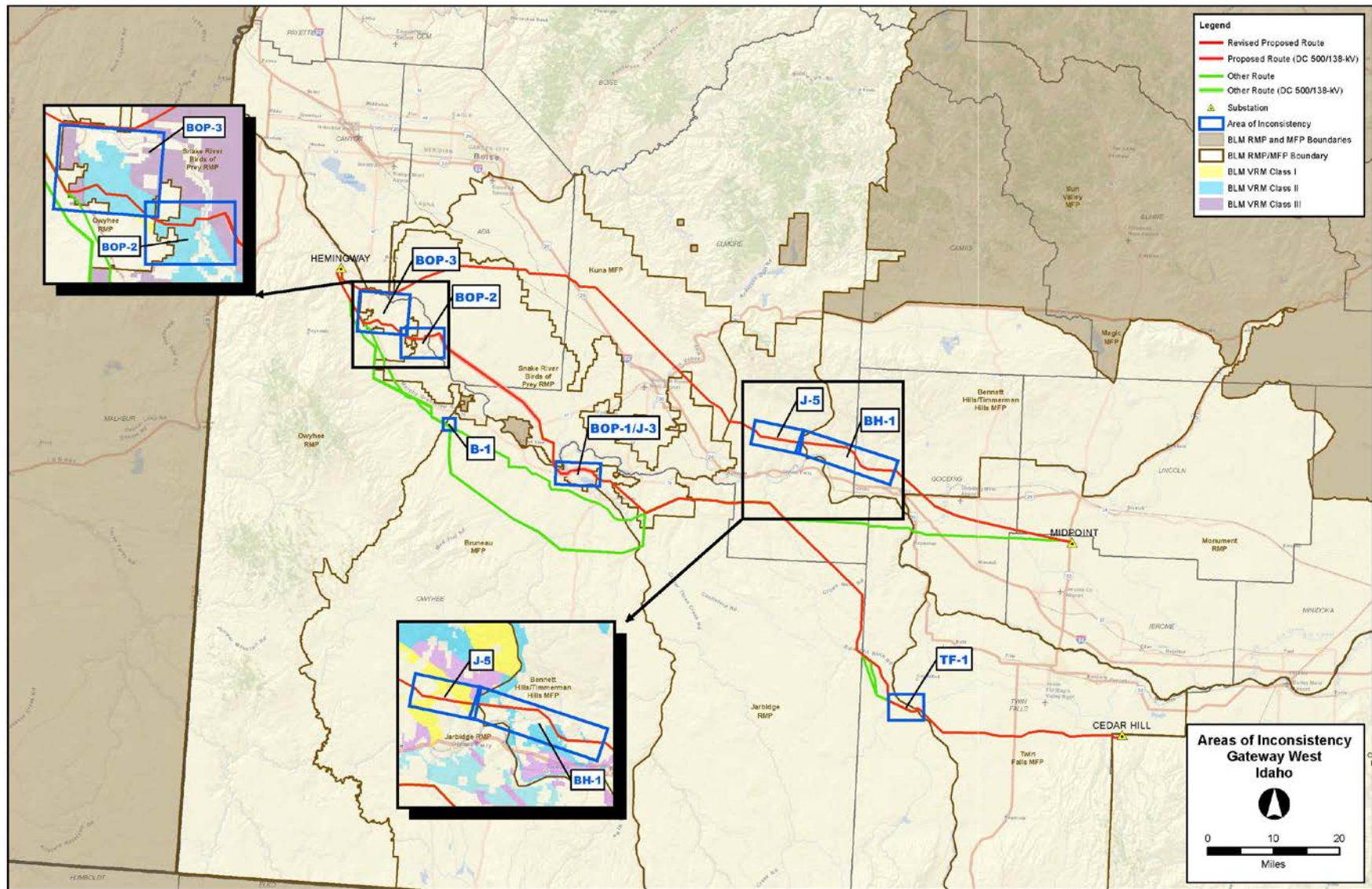


Figure 5-1. AOI Overview Map

## 5.1 Twin Falls MFP

All Alternatives would cross land managed under the Twin Falls MFP in the same alignment, though with different route names. Segment 9 of Co-Preferred Alternative 2 would cross following the alignment under the route label of 2013 FEIS Proposed Route for Segment 9 (hereafter referred to as FEIS Proposed 9). For Co-Preferred Alternative 5, the alignment would be followed using the route label of 9K. Alternative 1 follows the Revised Proposed Route, Alternatives 3 and 7 follow 9K, and Alternatives 4 and 6 follow FEIS Proposed 9.

The Twin Falls MFP (BLM 1982) provides direction for management of public land within its Planning Area under the jurisdiction of the Burley Field Office in south-central Idaho. The Twin Falls MFP Planning Area consists of approximately 809,000 acres in eastern Twin Falls County (see Figure 5.1-1). The Twin Falls MFP includes Objective L-4, which states “Confine future power transmission lines and oil and gas pipelines to designated corridor locations.

Objective VRM-1 states that the district is to “Manage all public lands in manner which will protect and maintain the existing visual qualities and provide for enhancement where consistent with management policies.” The Twin Falls MFP lists various VRM decisions starting with a high priority for the protection of Salmon Falls Creek. The VRM decisions are detailed as:

- “VRM-1.1 – Manage Salmon Falls Canyon between the Salmon Falls Dam and Lilly Grade for natural ecological change in accordance with a VRM Class I designation. This designation would include only the area from rim to rim. Manage the canyon from Lilly Grade to Balanced Rock under a VRM Class II designation.”
- “VRM-1.2 – Designate 12,695 acres as VRM Class II. This Class requires management activities to be designated and located to blend into the natural landscape and not to be visually apparent to the casual visitor. The following resource management guidelines shall apply:
  - 1) Range Management – Juniper and sagebrush removal must be made to simulate adjacent natural openings. Fences, water developments, etc., would require construction with mostly hand tools and be of natural materials. No red fence posts allowed.
  - 2) Structures – Structures must incorporate the natural lines, colors, and materials of the natural landscape, skylined structures would be prohibited.
  - 3) Roads – Required roads must be concealed by vegetation, follow natural landforms, and be seeded as soon as possible. Overland “roads” may be necessary in some areas to protect the scenic values. Cut and fill areas that exceed 5 feet will generally not be accepted unless the fill can be replaced and vegetation established in 2 years.”
- “VRM 1.3 – Designate 32,819 acres as VRM Class III. This class provides the management activities may be evident to the casual visitor; however, the activity should remain subordinate to the visual strength and natural character of the landscape. The following resource management guidelines shall apply:



- 1) Range management – Juniper and sagebrush clearings shall simulate typical natural openings.
- 2) Structures – Structures should incorporate the natural lines, colors and materials of the natural landscape. Skylined structures should be avoided, if possible.
- 3) Roads – Roads should be partially concealed by vegetation, follow natural landforms, and be seeded as soon as possible.”

Data from the visual resource inventory process are not available at this time, but it can be assumed that the above language from the MFP should be applied to the various VRM objectives assigned throughout the planning area.

An amendment to the MFP was approved in 1989, designating the Salmon Falls Creek ACEC to protect natural and scenic values. The Revised Proposed Route for Segment 9 would cross this area and therefore would not be in conformance with the management objectives.

Revised Proposed Route: The Revised Proposed Route for Segment 9 (Alternative 1) would cross land managed under the Twin Falls MFP. An amendment is proposed for AOI T-1. It would amend the Twin Falls MFP to change the VRM Class II area in the Salmon Falls ACEC crossed by the Project to VRM Class III.

The Segment 9 Revised Proposed Route is 165.3 miles long and connects the proposed Cedar Hill Substation with the Hemingway Substation. The line would be constructed as a single-circuit 500-kilovolt (kV) line. The primary concerns for siting in the eastern portion of this segment were avoidance of irrigated farmland and dairy operations; scattered residential development; interference with the Jarbidge Military Operating Area; making use of the WWE corridor; and minimizing impacts to visual resources. In the western portion of the Revised Proposed Route (within the Jarbidge and Owyhee Field Offices), following the WWE corridor was a primary objective. Other concerns included minimizing impact to Bruneau Dunes State Park and scenic qualities associated with the Bruneau River, avoiding conflicts with the Saylor Creek Air Force Range and Military Operating Area, and issues associated with crossing the SRBOP. Use of Public Land versus private land was an important issue for all portions of the route.

Additional Routes: FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6) and Route 9K (Co-Preferred Alternative 5 and Alternatives 3 and 7) follow the same alignment as the Revised Proposed Route for Segment 9 through the Twin Falls MFP Planning Area and would require the same amendment action.

Segment 8 (Segment 8 Revised Proposed Route, 8G, and 8H) does not cross land managed under the Twin Falls MFP.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required. One VRM Class II area in the Twin Falls MFP would be affected by the Project. AOI TF-1 was identified as an AOI because it is managed as VRM Class II. This AOI is located within Salmon Falls Creek ACEC. The presence of the proposed transmission line in this location would not conform to the visual management objectives. This section of Salmon Falls Creek is an eligible Wild and

Scenic River (WSR) segment; however, the Jarbidge Field Office has determined that this portion of the eligible river is Recreation eligible and that the transmission line crossing would not be in violation of managing for WSR eligibility.

#### **5.1.1 AOI TF-1 Salmon Falls Creek (Segment 9 – Revised Proposed Route / Route 9K / FEIS Proposed 9)**

The Salmon Falls Creek AOI is located approximately 4 miles south of Castleford, Idaho, in Twin Falls County. The AOI overlapped both the Twin Falls MFP and Jarbidge RMP boundaries before approval of the 2015 Jarbidge RMP, which designated the west side of the canyon in this area as VRM Class III. This means that the AOI now only applies to the Twin Falls MFP-managed areas, to the east side of Salmon Falls Creek. The Revised Proposed Route for Segment 9, FEIS Proposed 9, and Route 9K all follow the same alignment in this area, which proceeds west and north from the proposed Cedar Hill Substation, avoiding areas of irrigated agriculture. After crossing State Route (SR) 93, the route proceeds west to eastern border of Salmon Falls Creek ACEC, then turns northwest to parallel the east side of Salmon Falls Creek adjacent to an existing 138-kV transmission line for about 4.4 miles before turning west again and crossing the Salmon Falls Creek ACEC north of Lilly Grade, just north of the Salmon Falls Creek WSA, and VRM Class I designated area, but still part of the Salmon Falls Creek ACEC and eligible WSR segment. WSR eligibility requires management that prevents activities that could result in the river being declared WSR-unsuitable. The Revised Proposed Route for Segment 9/FEIS Proposed 9/9K would cross a Recreation portion of the river, adjacent to an existing single-phase low-voltage distribution line, just north of the Lilly Grade Road.

The AOI is managed as Class II and is crossed for 0.14 mile. Figure 5.1-2 shows the viewshed of the Salmon Falls Creek AOI; Revised Proposed Route, FEIS Proposed 9, 9K; and VRM management classifications. Figure 5.1-3 shows the AOI, routes, and amendment management recommendation.

##### **5.1.1.1 Routes Considered**

Several routes were analyzed in the 2013 FEIS that avoided the sensitive resources affected by the Revised Proposed Route/FEIS Proposed 9/9K. One of these routes (9B) would cross VRM Class II land near the Snake River as well as impacting residential and agricultural lands, and another route (9C) would cross Salmon Falls Creek in the vicinity of Balanced Rock County Park. The alignment for the Revised Proposed Route/FEIS Proposed 9/9K, which is the same as the FEIS Preferred Route in the Salmon Falls area, was selected by the Proponents based on its preferred location by Twin Falls County due to concerns over residential and agricultural impacts from the 2013 FEIS Route 9B.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

##### **5.1.1.2 Existing Landscape Conditions**

The 15-mile-radius study area for the Salmon Falls Creek AOI is located in southern Idaho. Approximately 75 percent of the study area is in Twin Falls County, and the remaining land is in Owyhee County. The topography is mostly flat to rolling with much

steeper slopes along the banks of Salmon Falls Creek and other drainages. Salmon Falls Creek traverses the study area in a canyon from the southeast, north to its confluence with the Snake River just north of the area at about mile 58.6. There are numerous farms and farmland in the northeastern part of this area with scattered farmland in other locations. The majority of the area is undeveloped. The small communities of Buhl and Filer are located along U.S. Highway (US) 30, in the northeast quadrant.

Attachment A, Figure TF-1a shows existing landscape conditions as viewed from Key Observation Point (KOP) 1068. The land adjacent to the proposed alignment is very flat and grass covered. In such an area, there is no topography or vegetation to screen views of the proposed line, which means skylining would occur. The steep topography along Salmon Falls Creek is not seen in the view from KOP 1068; however, it is discussed for KOP 1067 in the SEIS. KOP 1067 would not have a direct view of the Segment 9 Revised Proposed Route but it is representative of the existing landscape in the area and the views travelers would have both before and after seeing the Project.

Attachment A, Figure TF-1c shows the existing landscape conditions as viewed from KOP 1065. This represents the views of recreational users crossing the canyon at Lilly Grade. The Salmon Falls Creek Canyon is an aesthetic landscape element in the foreground and middle ground and represents a focus point at this location. Open panoramic views of the rolling (plains) to rugged (canyon) terrain are considered to have moderate scenic quality due to the muted sagebrush grassland vegetation adjacent to the rocky faces of the canyon. The view is representative of the Dissected High Lava Plateau eco-region which has alluvial fans, rolling plains, and sheer-walled canyons that are cut into extrusive rocks. This parcel of land administered by the BLM is managed to conform to VRM Class II objectives.

Attachment B, Figure B-1 shows views of the existing conditions as viewed from KOP 1067.

#### **5.1.1.3 Conformance Analysis**

Figure 5.1-2 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Attachment A, TF-1b simulates landscape conditions showing for the Revised Proposed Route as viewed from KOP 1068, and Figure TF-1d simulates conditions as viewed from KOP 1065.

Sensitive views of the sagebrush steppe and rolling grasslands west of Twin Falls adjacent to Salmon Falls Creek are important to the surrounding sensitive viewers such as recreational drivers, represented by views from KOPs 1068 and 1067, as well as the numerous residences on the east side of the creek. The flat to rolling landscape views from KOP 1068 exhibit little diversity in form, line, color, or texture. There is very little development visible this far from Twin Falls, Idaho. From this broad open vantage point it is apparent that screening and other mitigation efforts would not be successful in lowering impacts to scenic resources in the surrounding area. The flat plain and strong horizon line would be directly contrasted with the proposed transmission structures for the proposed transmission line would be visible and dominant. Views in the Salmon Falls Creek Canyon are also an important scenic resource and located in an interesting and diverse canyon landscape. The VRM Class II and scenic outstandingly remarkable values (ORV) objectives in the MFP have been assigned from canyon rim to canyon rim

to protect the viewshed of Salmon Falls Creek Canyon. Views from KOP 1065 represent the views of recreational users at the crossing of Lilly Grade Road and Salmon Falls Creek looking southeast toward rolling, undulating terrain of the Antelope Pocket. The view is representative of the Dissected High Lava Plateau eco-region, which has alluvial fans, rolling plains, and sheer-walled canyons that are cut into extrusive rocks. Open panoramic views of the rolling (plains) to rugged (canyon) terrain are considered to have moderate scenic quality due to the muted sagebrush grassland vegetation adjacent to the rocky faces of the canyon. The canyon for Salmon Falls Creek is an aesthetic landscape element in the foreground and middleground views, and is a focus point for the view. Through micrositeing, it is likely that towers could be set back from the canyon rim such that the visual intrusion within the canyon would be confined to the conductors. The view from KOP 1067 would be typical of travels within the canyon and demonstrates the potential for micrositeing to minimize visual impacts. Nevertheless, any intrusion would not conform to VRM Class II objectives. In addition, it would not conform to the management of the area according to the 1989 Salmon Falls ACEC amendment to the Twin Falls MFP, which prohibits powerline crossings and other such visual intrusions (see Appendix F of the SEIS).

#### **5.1.1.4 Proposed Plan Amendment**

There is a high degree of visual sensitivity in the crossing of Salmon Falls Creek due to its VRM Class II management objective, ACEC designation, and eligible WSR status. An amendment to the ACEC objectives and an amendment to the MFP VRM objectives would be needed to build this route.

The 1989 amendment establishing the Salmon Falls Creek ACEC directed the management of the Twin Falls MFP side to be consistent with the direction in the existing Jarbidge RMP. The 1987 Jarbidge RMP was more recent and had established protection measures for the area; therefore, the amendment directed management to be consistent on both sides of the creek. The 2015 Jarbidge RMP established a corridor (the Roseworth Corridor) where the Project would cross the canyon. Management within this corridor allows for overhead transmission lines and designates the majority of the ACEC area within the corridor as VRM Class III.

It is recommended that if the Segment 9 Revised Proposed Route (Alternative 1), FEIS Proposed 9 (Alternatives 2, 4, and 6), or Route 9K (Alternatives 3, 5, and 7) is selected, the Project be allowed to cross the ACEC and change the VRM classification to VRM Class III within this AOI area. This would provide similar management guidance to that provided on the Jarbidge side of the canyon and provide consistency with adjacent management goals.

If this route is selected, it is recommended that the Proponents be required to microsite structures to minimize the visibility from within the Salmon Falls Creek canyon. As discussed in Appendix F, this amendment, in addition to the amendment allowing the overhead crossing of the canyon by Gateway West, would affect how the BLM is able to manage the land according to the amendment to the MFP establishing the Salmon Falls Creek ACEC. The ACEC direction specifically states that no overhead crossing would be permitted. The Jarbidge BLM Field Office has stated that the crossing would not affect WSR eligibility because this section is only eligible for recreation, and they have

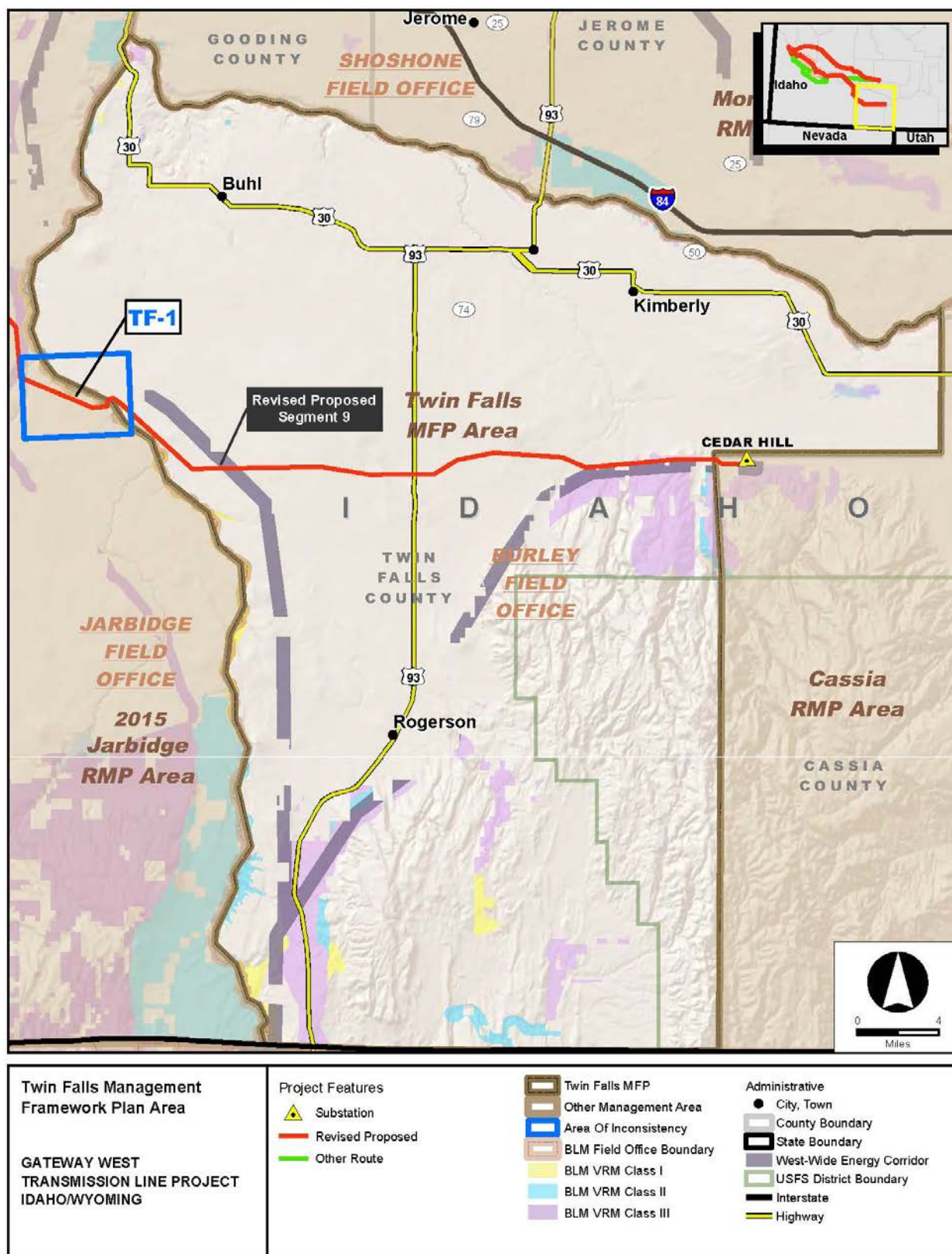
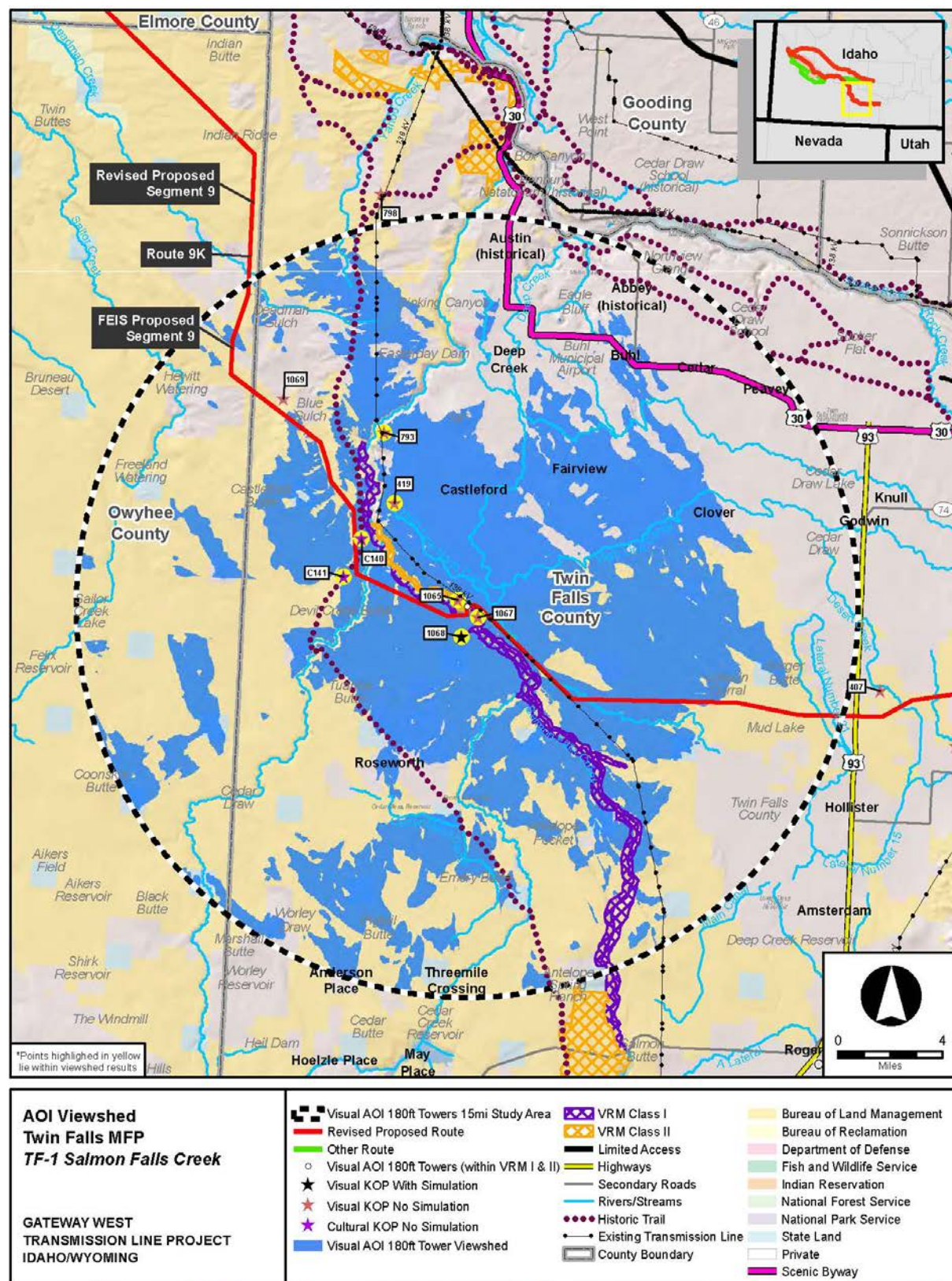


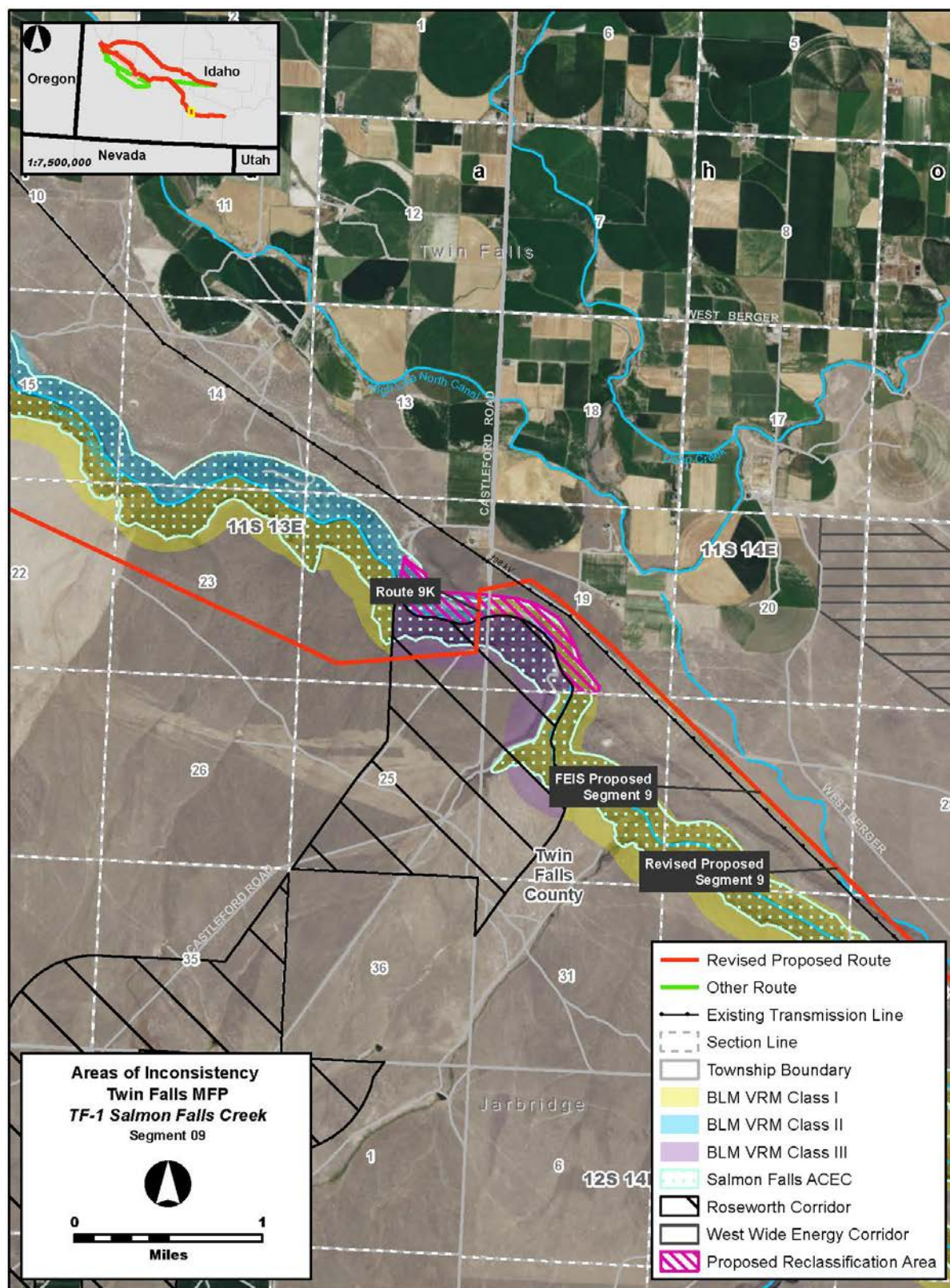
Figure 5.1-1. Twin Falls MFP Boundary Map





**Figure 5.1-2.** AOI TF-1 Salmon Falls Creek Visual Analysis for the Segment 9 Revised Proposed Route/FEIS Proposed 9/9K (Amendment SEIS-2)





**Figure 5.1-3.** AOI TF-1 Salmon Falls Creek Detailed Map Showing the Proposed VRM Action for Amendment SEIS-2 within the Twin Falls MFP Planning Area

stated that such a crossing would not impair the ORVs. The crossing would result in a high visual impact at the canyon rims, but visibility would be reduced once in the canyon. While the area of the AOI within the Twin Falls MFP Planning Area is relatively small, it is part of the protective management actions for the Salmon Falls Creek canyon. Changing this VRM Class would result in a lower level of management protection for this resource.

## **5.2 1987 Jarbidge RMP**

In August 2015, the BLM approved a new RMP for the Jarbidge Field Office area. This new RMP modified VRM designations within the current Jarbidge Field Office boundaries. The proposed Project and Alternatives would be in conformance with these new VRM designations within the area covered by the 2015 RMP. The boundaries for this RMP coincide with the current boundaries of the Jarbidge Field Office, which is smaller than the area covered by the 1987 RMP; therefore, there are still a few areas crossed by the Project that are managed under the 1987 RMP where the land is not included in any more recent land use plans. This includes the area north of the Snake River (which is crossed by the Revised Proposed Route for Segment 8) and the arm of land extending to the west of the Field Office that joins with the SRBOP (which is crossed by the Revised Proposed Route for Segment 9). The 1987 Jarbidge RMP includes a map of VRM classified lands (Map 9). In addition, the RMP provides locations of utility lines and utility avoidance areas (Map 7). Segments 8 and 9 of the Revised Proposed Route as well as Route 8H would cross areas managed under the 1987 RMP that would not conform to VRM designations.

Revised Proposed Routes: The Segment 8 Revised Proposed Route (Co-Preferred Alternative 2, Alternatives 1 and 3) would cross a VRM Class I area near the Oregon Trail in an area still managed under the 1987 Jarbidge RMP within the Four Rivers Field Office (AOI J-5). An amendment would be needed to change the area from VRM Class I to VRM Class IV. The Segment 9 Revised Proposed Route (Alternative 1) would cross a small parcel of VRM Class II just west of the SRBOP (AOI J-3). An amendment would be needed to change the area from VRM Class II to VRM Class III.

The Segment 8 Revised Proposed Route would be 129.7 miles long and connect the Midpoint Substation to the Hemingway Substation with a single-circuit 500-kV line. The route location was selected to follow the WWE corridor or existing transmission lines and avoid agricultural lands, especially in the southeastern portions. The Revised Proposed Route is within the WWE corridor for a portion of its total length. Constraints on federal land include historic trails, wetlands, steep slopes, and raptor nests. Route 8G (and the part of 8H that is identical to 8G) was developed to avoid the SRBOP and the city of Kuna. This route would follow the WWE corridor and parallel Route 9K for the majority of its route through the Jarbidge RMP Planning Area. Additional routes were identified and discussed within the 2013 FEIS.

The Segment 9 Revised Proposed Route would be a 165.3-mile-long 500-kV single-circuit line that would connect the proposed Cedar Hill Substation with the Hemingway Substation. Primary siting considerations in the eastern portion of this segment were avoidance of irrigated farmland, dairy operations, and scattered residential development; avoiding interference with the Jarbidge Military Operating Area; making



use of the WWE corridor; and minimizing impacts to visual resources. In the western portion, following the WWE corridor was a primary objective, with other concerns such as minimizing impact to Bruneau Dunes State Park and scenic qualities associated with the Bruneau River, and avoiding conflicts with the Saylor Creek Air Force Range and Military Operating Area. This route was developed to utilize public land and would follow an existing transmission line through the SRBOP. In addition, certain areas through the SRBOP would be double-circuited (see route description in Chapter 2 of the SEIS). Route 9K would follow the same alignment as the Segment 9 Revised Proposed Route through much of the Jarbidge RMP Planning Area; however, at the western edge, it diverges and travels south, following a modified version of the alignment for FEIS Route 9E. This route avoids most of the SRBOP.

Additional amendments were proposed in the 2013 FEIS; however, the Project would now be in conformance with the VRM in these areas (AOIs J-1, J-2, and J-4) under the 2015 RMP. The Jarbidge RMP (BLM 1987) and 1989 amendment provided VRM guidance, management for the Salmon Falls Creek ACEC, which precluded new overhead utility lines. The 2015 RMP establishes the Roseworth Corridor for utility use and designates the VRM in the ACEC within the corridor as VRM Class III; therefore, an amendment is no longer required. The Saylor Creek AOI (J-2) was designated VRM Class II in the 1987 RMP, but is within the Saylor Creek Corridor and VRM Class IV in the 2015 RMP, so an amendment is no longer needed.

Other Routes: Route 9K (Co-Preferred Alternative 5, Alternatives 3 and 7) follows the same route as the Segment 9 Revised Proposed Route through most of its alignment through the Jarbidge Field Office, turning south before Segment 9 of the Revised Proposed Route heads northwest towards the SRBOP, and AOI J-3. This route would not cross any AOIs in the Jarbidge Field Office under the 2015 RMP, and does not cross any areas managed under the 1987 Jarbidge RMP. FEIS Proposed 9 (Co-Preferred Alternative 2, Alternatives 4 and 6) follows the same alignment as Route 9K through the Jarbidge Field Office. Route 8G crosses into the Jarbidge Field Office near the northeast corner of the management area and heads west until it meets up with Route 9K, at which point it would parallel that route through the remainder of the Field Office. Route 8G (Co-Preferred Alternative 5 and Alternative 4) conforms to the VRM in the 2015 RMP and does not cross land managed under the 1987 RMP. Route 8H (Alternatives 6 and 7) would follow the same alignment as the Revised Proposed Route for Segment 9, east of the Jarbidge Field Office, crossing the same AOI (J-3).

The former AOI J-4 area crossed by Route 8G was designated as VRM Class I in the 1987 Jarbidge RMP, but was designated as the Saylor Creek and Shoestring Corridors in the 2015 RMP with a VRM of Class III and IV. The former AOI J-2 area crossed by Routes 8G and 9K was designated VRM Class II in the 1987 Jarbidge RMP but was designated as the Saylor Creek Corridor in the 2015 RMP with a VRM of Class IV.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required. While approval of the 2015 Jarbidge RMP means that the Project is now in conformance with the VRM requirements within the Jarbidge Field Office, there are two areas where the Revised Proposed Routes (and Route 8H, following the same alignment as the Revised Proposed Route for Segment 9) cross

land that is now in the Four Rivers FO and still managed under the 1987 Jarbidge RMP and where the routes would not conform to the 1987 RMP VRM objectives. As a result, BLM action would be necessary to modify the visual classifications and management to conform to the RMP. The AOIs are described in Sections 5.2.2 and 5.2.3, below.

### **5.2.1 Former AOIs Where the Project Now Conforms to the VRM Objectives, due to Reclassification in the 2015 Jarbidge RMP**

Three AOIs in the 2013 FEIS are no longer considered AOIs for the SEIS analysis due to the approval of the 2015 Jarbidge RMP. The new RMP has new VRM designations that the Project would conform to. A brief summary for each of these former AOIs is provided below. As stated above, however, this RMP only applies to the current Jarbidge Field Office boundaries; therefore, the Project still does not conform to the VRM classification where the AOIs were located outside of the current Jarbidge Field Office boundaries, and where no more recent management plans have been adopted.

#### **5.2.1.1 2013 FEIS AOI J-1/TF-1 Salmon Falls Creek (Segment 9 Revised Proposed Route/FEIS Proposed 9/9K)**

The Salmon Falls Creek crossing is located approximately 4 miles south of Castleford, Idaho, in Twin Falls County. This area overlaps both the Twin Falls MFP and Jarbidge RMP boundaries. Segment 9 of the Revised Proposed Route, FEIS Proposed 9, and Route 9K follow the same alignment across Salmon Falls Creek. The 1987 Jarbidge RMP and 1989 ACEC amendment designated the area as VRM Class II and prohibited new overhead utility lines, respectively, which the Project would not be in conformance with. The 2015 Jarbidge RMP, however, designated this location as part of the Roseworth Corridor and classified the area as VRM Class III. This designation allows for the utility line crossing, if done according to RMP requirements; therefore, an amendment is no longer required and an AOI analysis is not needed. This area is not discussed further in this section.

#### **5.2.1.2 2013 FEIS AOI J-2 Saylor Creek (Segment 9 Revised Proposed Route/FEIS Proposed 9/9K, 8G, 8H)**

The Saylor Creek area crossing is located about 4 miles south of the Snake River, approximately 18 miles south of Mountain Home, Owyhee County, Idaho, and is less than 1 mile west of the Elmore County/Owyhee County boundary. As the routes proceed west, constrained on the south by the Saylor Creek Range Air Force restricted area and on the north by Bruneau Dunes State Park, they cross approximately 2 miles of land classified as VRM Class II in the 1987 Jarbidge RMP. This area is located in a low interval of hills within the WWE corridor. Segment 9 of the Revised Proposed Route, FEIS Proposed 9, and Routes 8G, 8H, and 9K would all cross this area. If an alternative including Route 8G or 8H is selected (Co-Preferred Alternative 2, or Alternatives 1, 3, 6, or 7), two lines would run parallel through this area. The 2015 Jarbidge RMP classifies this area as VRM Class IV and designates a corridor where the route alignment is located. The Project would now conform to the VRM objectives of the managing RMP and is no longer inconsistent with management in the area. This area is therefore not discussed further in this section.

### **5.2.1.3 2013 FEIS AOI J-4 Oregon Trail (Segment 8 – Route 8G/8H)**

This area is located approximately 13 miles east and slightly north of Hagerman, Idaho. Routes 8G and 8H share the same alignment, which passes through the area of the former Oregon Trail AOI. Route 8G/8H follows a route similar to portions of the 2013 FEIS Routes 8A and 9B, which passed less than 1 mile from each other. Both alignments were identified as potential routes because they follow the WWE corridor for much of their lengths. Route 8G/8H would follow existing transmission lines through this area and crosses the Oregon Trail AOI in a westerly fashion, crossing just south of the southern portion of the AOI crossed by FEIS Route 8A and at an almost identical location as FEIS Route 9B. The 1987 Jarbidge FEIS designated land crossed by the route in this area as VRM Class I; however, the 2015 Jarbidge RMP designates this area as a utility corridor and VRM Class IV. The route would conform to these updated designations and an amendment would not be needed. Therefore, this area is not further discussed in this section.

### **5.2.2 AOI BOP-1/J-3 South Oregon Trail (Segment 9 Revised Proposed Route/8H)**

The South Oregon Trail AOI is located north and south of the Snake River, beginning at the C.J. Strike Reservoir dam. This AOI overlaps both the SRBOP and Jarbidge RMP boundaries. This route follows a modified version of FEIS Route 9D/9G and FEIS Route 9F/9H, leaving the alignment for FEIS Proposed 9 and Route 9K near Bruneau, Idaho, heading northwest for about 6 miles before intercepting the C.J. Strike Reservoir, formed at the junction of the Bruneau River and the Snake River. Land surrounding the reservoir has been designated as VRM Class II due to its scenic qualities and close proximity to the Oregon National Historic Trail (NHT). The route initially enters the SRBOP briefly then re-enters the SRBOP, double-circuiting with the existing C.J. Strike – Bruneau Bridge 138-kV transmission line in the current right-of-way (ROW) at milepost (MP) 106.2 for approximately 3.1 miles (the existing 138-kV structures would be removed). At MP 109.4, the two circuits separate to permit a more feasible crossing of the Narrows between C.J. Strike Reservoir and the Bruneau Arm. On the west side of the Bruneau River, the two lines again become a double circuit at MP 110 across the Cove non-motorized and recreation areas, and continue west approximately 2 miles to the C.J. Strike Dam, where the lines again separate at MP 112 and the existing 138-kV line enters a substation at the dam. The Segment 9 Revised Proposed Route continues west on the south side of the reservoir crossing back to the north side of the Snake River approximately one-half mile downstream from C.J. Strike Dam. Although not located within a WWE corridor, this route follows existing transmission lines through much of its alignment.

The portion of the AOI within the Jarbidge RMP crosses 0.3 mile of BLM-administered land managed for VRM Class II objectives. The land crossed is along the northern plateau to the north of the Snake River.

Figure 5.2-2 shows the viewshed of the South Oregon Trail AOI, the Segment 9 Revised Proposed Route/8H, and VRM management classifications. Figure 5.2-3 shows the AOI, routes, and amendment management recommendation.

### **5.2.2.1 Routes Considered**

Three routes in the western portion of Segment 9 were analyzed in the FEIS as a means of connecting the Cedar Hill and Hemingway Substations. The FEIS Proposed 9 is largely within the WWE corridor but crosses more private land than the other routes. The Segment 9 Revised Proposed Route is a modification of FEIS Routes 9D, 9F, 9G, and 9H through the SRBOP, which are part of an alignment identified by the Owyhee County task force and recommended by Owyhee County to avoid private land and maximize the use of public land. The revisions from the FEIS routes include adjusting where the route crosses south of the Snake River. The Segment 9 Revised Proposed Route would cross at the western edge of the narrows of the Bruneau Arm. This is a modification from the FEIS route, which crossed at the eastern end of the narrows and then followed the southern edge of the Cove non-motorized area. The revision crosses a small section of the Cove non-motorized area in the northwest corner. No VRM Class I or Class II areas managed by the 1987 Jarbidge RMP are crossed by FEIS Proposed 9, Route 9K, or FEIS Route 9E.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

### **5.2.2.2 Existing Landscape Conditions**

The Snake River is the major water feature in the 15-mile-radius area surrounding the South Oregon Trail AOI. The river crosses the middle of the area from west to east and leaves the study area in the vicinity of Indian Cove. C.J. Strike Reservoir is located at the northern end of the Bruneau Valley in the center of the area. The topography is generally flat to rolling with numerous drainages. Although much of the area is undeveloped, there are large areas of farms and farmland along the Snake River, south of Mountain Home, and in other locations such as the Bruneau Valley and Twentymile Flat. SR 78 is the major road and generally follows the Snake River east to west. SR 51 extends north to south through the area. There are a number of communities along the local highways and Snake River including Grandview and Bruneau. Mountain Home Air Force Base is located in the northeast portion of the study area. Numerous transmission lines cross this area. In addition to the highways and communities, other potential viewing areas include recreation areas such as Bruneau Dunes State Park, the SRBOP, and historic sites and trails. KOP 1155 shows views of the Snake River from Oregon NHT visitor's center. KOP 1154 shows views of existing transmission lines at the C.J. Strike Reservoir.

The Jarbidge portion of this AOI consists of a small parcel of VRM Class II land just east of the SRBOP. KOP 1156 is located southwest of this area and is more relevant to the BOP-1 AOI but describes some of the typical area of interest in the general vicinity. The Jarbidge portion of the AOI area consists of flat topography above the Bruneau Arm of the C.J. Strike Reservoir (see Figure 5.2-3), and approximately 0.2 mile north of the South Alternate Oregon Trail. KOP C117 is approximately one mile northwest of this location, on a segment of the Oregon NHT – South Alternate, where it consists of an undisturbed set of swales. A transmission line with wooden, H-frame support structures is visible approximately 100 feet west of the trail at this location, and an additional transmission line with wooden, single-pole supports is visible approximately 150 feet

west of the trail. The landscape consists of flat land to rolling hills with grass and sagebrush dominating the vegetation.

Attachment B, Figure B-2 shows the view of the existing conditions from KOP C117. Figure B-3 shows an alternate view of the existing conditions from KOP 1156. Figure B-4 shows the view of the existing conditions from KOP 1155.

### **5.2.2.3 Conformance Analysis**

Figure 5.2-2 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Due to topography, only portions of the Segment 9 Revised Proposed Route would be visible from this location. The Project is located to the south of KOP C117, away from existing impacts to the cultural landscape. Due to the proximity of the KOP and the introduction of new elements in a new area of the resource's viewshed, the visual contrast rating (VCR) for this KOP is assessed as moderate to strong. The proposed Project elements would dominate the setting to the south; therefore, there would be an adverse impact to the resource at this location.

Scenic views of the C.J. Strike Reservoir and the surrounding Snake River Plain are available to sensitive recreational viewers at nearby locations including KOPs 1154 and 1156, and visitors to the Oregon NHT (KOP 1155). The views of the undulating to rocky terrain from these viewpoints exhibit diversity in form, line, and texture with numerous human-made features such as high voltage transmission lines and a dam. From these KOPs, it is apparent that the Segment 9 Revised Proposed Route/Route 8H would be visible in the foreground and middle ground, sometimes skylined and at other times backdropped. In this location, the existing wood pole H-frame structures would be replaced with double-circuit 500/138-kV structures. Screening and other mitigation efforts would be moderately successful at lowering impacts to scenic resources in the surrounding area. The undulating and rugged terrain with mottled and diverse vegetation and expansive waters of the reservoir would be moderately contrasted by an additional set of structures. These additions would draw the attention of the casual observer in certain portions of the area; represent a deviation from the natural form, line, color, and texture of the surrounding landscape; and thus would not conform to VRM Class II objectives. The Boise District office has stated that the alignment to the east and north of the river within the VRM Class II area would be buffered by topography and thus would not attract the attention of the casual observer. It appears that VRM Class II objectives have been assigned to this particular area to protect the Oregon NHT corridor and adjacent landscapes.

### **5.2.2.4 Plan Amendment for Segment 9 Revised Proposed Route**

A high-voltage transmission line would not conform to the VRM Class II management goals for those VRM Class II areas west of the Snake River. It is recommended that, if the Segment 9 Revised Proposed Route (Alternative 1) or Route 8H (Alternatives 6 and 7) is selected, VRM Class II areas associated with the route be reclassified to VRM Class III for the Jarbidge RMP portion of AOI BOP-1/J-3 (see Figure 5.2-3).

### **5.2.3 AOI J-5 North Oregon Trail (Segment 8 Revised Proposed Route)**

The North Oregon Trail AOI is located about 4 miles north of Glens Ferry, Idaho. From Midpoint Substation, the Segment 8 Revised Proposed Route proceeds to the west-northwest following existing transmission lines. As the route approaches King Hill Creek, approximately 3.2 miles of VRM Class I land is crossed, just south of Blair Trail Reservoir. Visually sensitive features in this area include views of Bennett Mountain to the north, Kings Crown to the east, and several Oregon NHT segments. Figure 5.2-4 shows the viewshed of the North Oregon Trail AOI, the location of the Revised Proposed Route and other routes, historic trails and VRM management classifications. Figure 5.2-5 shows the AOI and amendment management recommendations.

#### **5.2.3.1 Other Routes Considered**

Route 8G/8H would avoid this area and would cross the Jarbidge Field Office south of the Snake River within the Shoestring and Saylor Creek Corridors. It would parallel Route 9K through much of the Jarbidge Field Office and continue to do so through the Owyhee and Bruneau Field Offices, where it would cross one isolated parcel of VRM Class II land. No VRM amendments to the 1987 or 2015 Jarbidge RMPs would be needed for Route 8G/8H, although a VRM amendment would be needed for the Bruneau MFP.

There are no routes in the vicinity of the Revised Proposed Route that would completely avoid VRM Class I and II land, due to the presence of scenic local features, historic trails, and the Snake River Canyon. Several Segment 8 routes were reviewed for the 2013 FEIS in locations north of the Proposed Route; however, these routes had even greater impacts to sensitive visual resources, steep terrain, and Special Recreation Management Areas (SRMA) and ACECs. The FEIS Route 8A is the nearest feasible alternate route within the vicinity of the Segment 8 Revised Proposed Route. This route was described in the 2013 FEIS.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

#### **5.2.3.2 Existing Landscape Conditions**

The Snake River is the major water feature in the 15-mile-radius area surrounding the North Oregon Trail AOI. It crosses the southern half of the area from east to west and leaves the study area just east of the community of Mountain Home. The flat to rolling topography on both sides of the river is cut by numerous drainages, many with steep, canyon-like walls. The northern part of the area is occupied by steep terrain of the Bennett Hills. Although much of the area is undeveloped, there are large areas of farms and farmland along the Snake River and in other locations such as Indian Cove, Deadman Flat, Black Mesa, and Pasadena Valley. Interstate 84 crosses southeast and then east through the study area. Communities such as Hammett, Glens Ferry, and King Hill are located along local highways and the Snake River. Numerous transmission lines cross northwest to southeast through this area. Potential viewing areas include highways, communities, historic sites and trails, and recreation areas such as Three Island Crossing State Park. Scenic views of Kings Crown along the foothills of Bennett Mountain are represented by KOPs C108, 1209, and 1210. KOPs 1209 and 1210 represent local residents whereas KOP C108 represents recreational viewers on the Oregon NHT.

Attachment A, Figure J-5a shows existing landscape conditions as viewed from KOP 1350. The land in close proximity to the alignment is very flat and grass-covered. In such an area, there is no topography or vegetation to screen views of the proposed line, which means skylining would occur.

Attachment A, Figure J-5c shows existing landscape conditions as viewed from KOP C83. This KOP is located on a segment of the North Alternate Oregon Trail near the site of the Canyon Creek Stage Station where the trail intersects King Hill Road. The KOP is approximately 1.1 miles west of King Hill Creek and 2.7 miles northwest of the Snake River. The KOP is 0.5 mile south of the Segment 8 Revised Proposed Route. The resource at this location consists of a moderately deep swale. The setting contains a wooden, H-frame transmission line less than 0.25 mile to the north and modern ranching properties are visible approximately 2 miles to the east.

Attachment B, Figures B-5, B-6, and B-7 show the existing conditions as viewed from KOPs C108, 1209, and 1210, respectively.

#### **5.2.3.3 Conformance Analysis**

Figure 5.2-4 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Attachment A, Figure J-5b simulates landscape conditions showing for the Revised Proposed Route as viewed from KOP 1350. Attachment A, Figure J-5d simulates landscape conditions showing for the Revised Proposed Route as viewed from KOP C83. The Project's design shares some similarities with existing structures in the area but would introduce new elements that are of different form, material, and texture. Due to these factors, the KOP's proximity to the route, and the potential for the elements to blend into the backdrop, the VCR for this KOP is assessed as weak to moderate. The Project elements may draw the attention of the casual observer; therefore, there would be an adverse impact to the resource at this location.

The views of the undulating terrain adjacent to KOPs C108, 1209, and 1210 exhibit some diversity in form, line, and texture and include numerous human-made features. KOP C108 has a view of a high-voltage transmission line. KOPs 1209 and 1210 have views of numerous high-voltage transmission lines and a wind farm. From these KOPs, the Revised Proposed Route for Segment 8 would be moderately visible due to the presence of existing transmission lines and structures. Screening and other mitigation efforts would not lower impacts to scenic resources in the surrounding area.

The additional set of transmission structures and access roads would be in contrast with the landscape topography, draw the attention of the casual observer, and represent a deviation from the natural form, line, color, and texture, which would not conform to VRM Class I objectives.

#### **5.2.3.4 Plan Amendment for Revised Proposed Route**

An amendment is proposed if the Segment 8 Revised Proposed Route (Alternatives 1, 2, and 3) is selected. The amendment would reclassify the area that would be impacted by the transmission line, now managed to conform to VRM Class II objectives, to be managed under VRM Class IV objectives (see Figure 5.2-5).



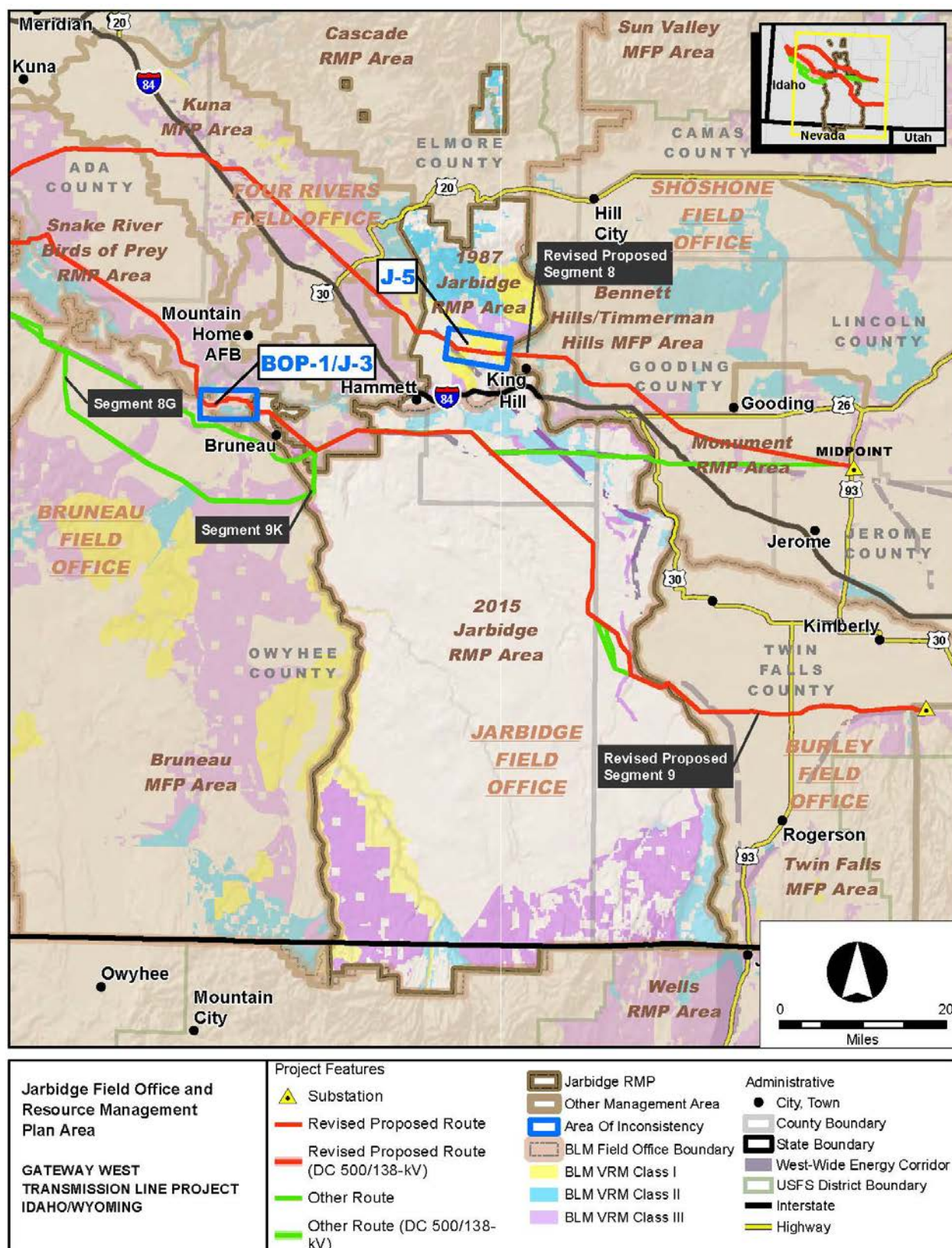
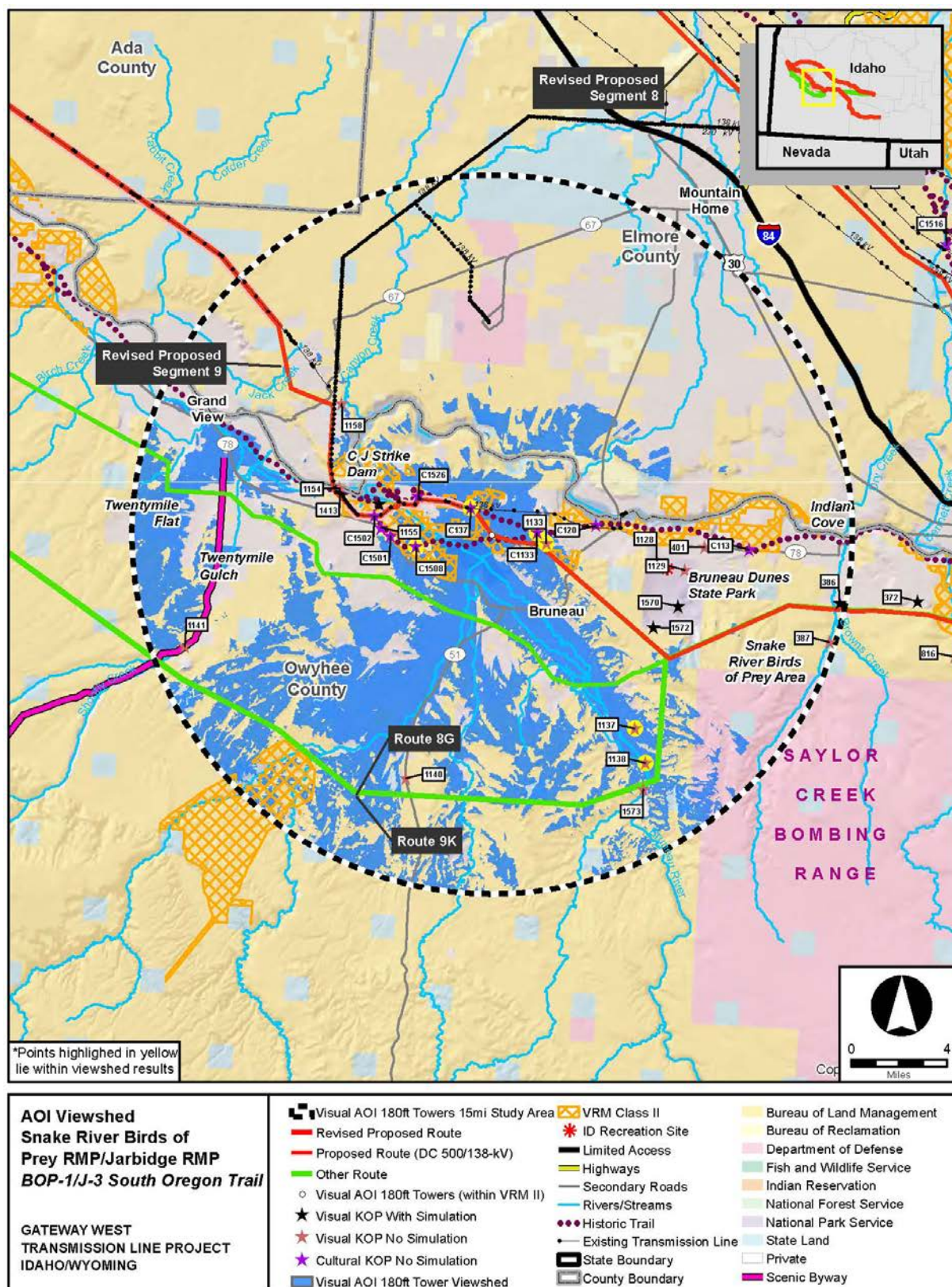


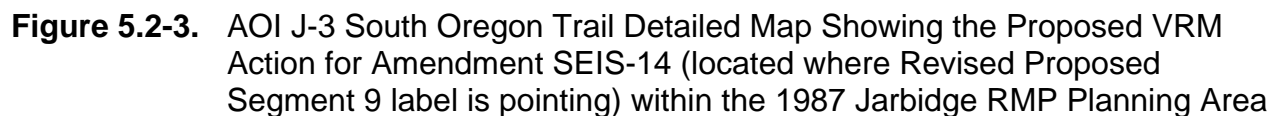
Figure 5.2-1. Jarbidge RMP Boundary Map



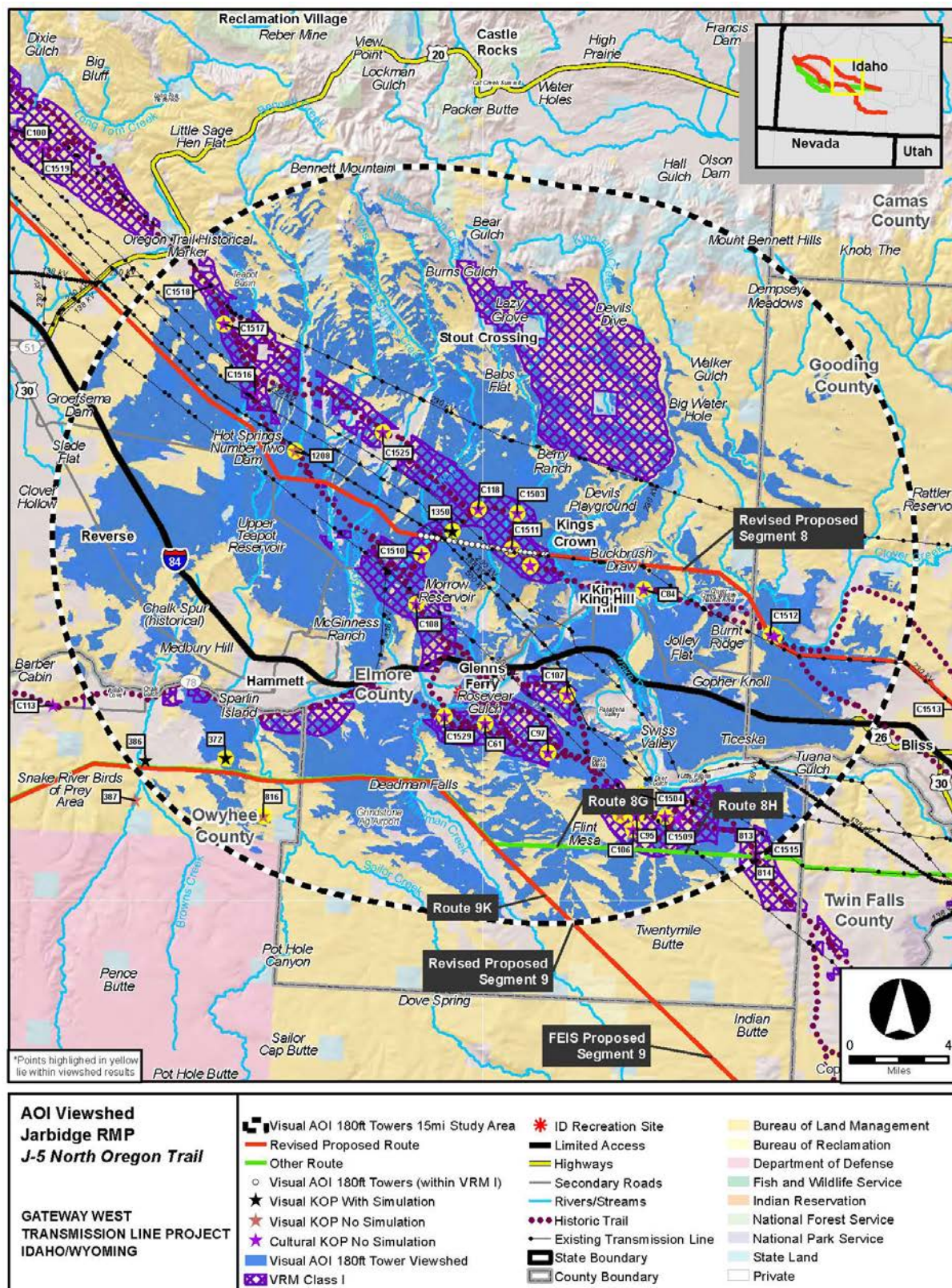


**Figure 5.2-2.** AOI J-3 South Oregon Trail Visual Analysis for the Segment 9 Revised Proposed Route/8H (Amendment SEIS-14)



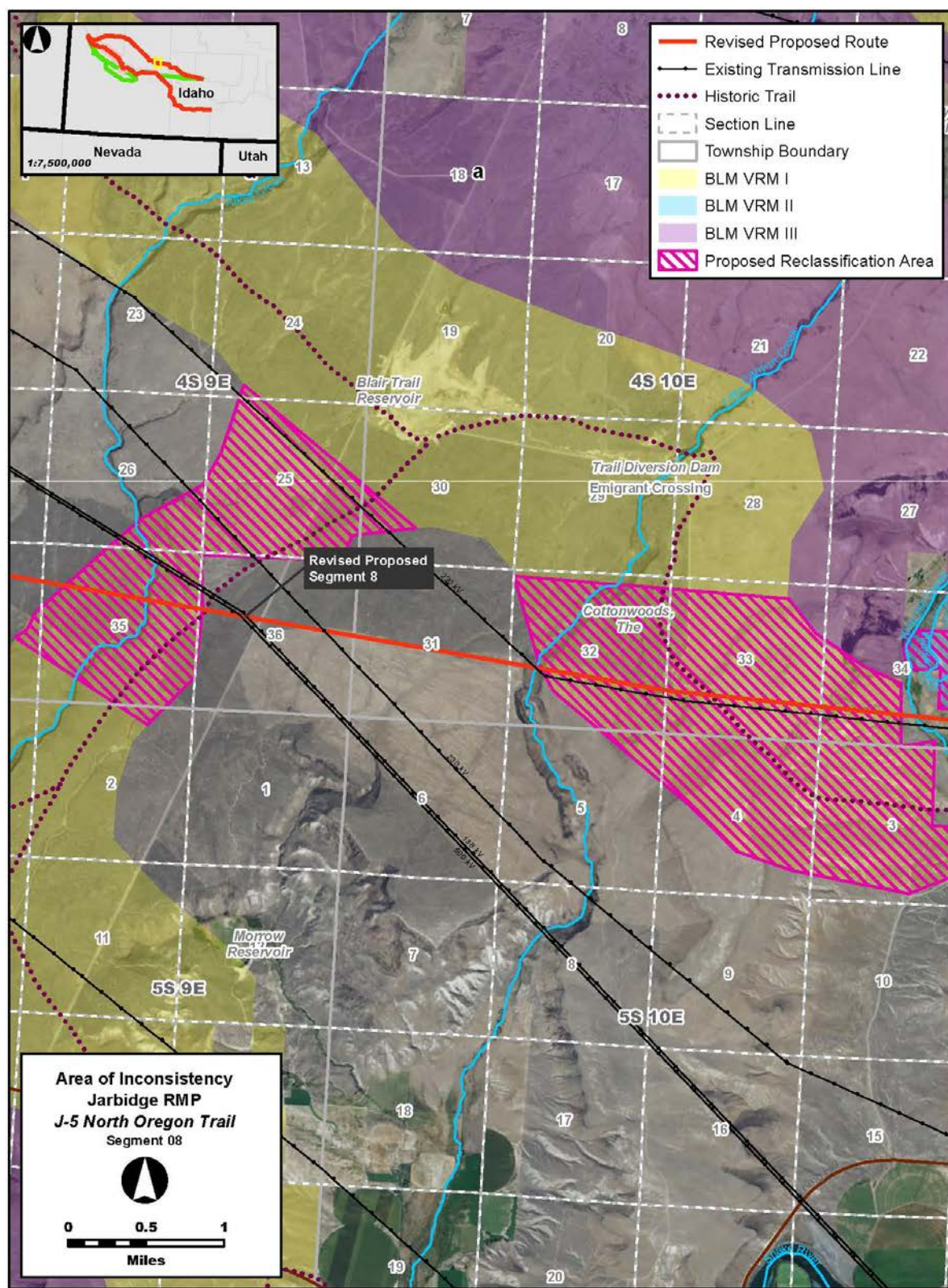






**Figure 5.2-4.** AOI J-5 North Oregon Trail Visual Analysis for the Segment 8 Revised Proposed Route





**Figure 5.2-5.** AOI J-5 North Oregon Trail Detailed Map Showing the Proposed VRM Action for Amendment SEIS-5 within the 1987 Jarbidge RMP Planning Area

### 5.3 SRBOP RMP

The SRBOP RMP (BLM 2008a) provides guidance for the public lands and resources within the SRBOP that are managed as a part of the BLM Four Rivers Field Office. The SRBOP contains approximately 483,700 acres of Public Land extending 81 miles along the Snake River in the Idaho counties of Ada, Canyon, Elmore, and Owyhee (see Figure 5.3-1). The SRBOP includes the 138,000-acre Orchard Combat Training Center,<sup>3</sup> used by the Idaho Army National Guard for military training since 1953. The RMP provides for protection of the Oregon NHT as a VRM Class II management area. The RMP further provides direction to “manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the Army National Guard Orchard Training Area (OTA) as VRM Class IV, and remaining areas as Class III. This RMP will provide reasonable protection of the Oregon Trail and flexibility in managing the remainder of the NCA.”

Portions of all routes for all Alternatives would cross the SRBOP RMP management area; however, only the alignment for the Segment 9 Revised Proposed Route/Route 8H would cross AOIs in this area. The 2013 FEIS routes included analysis of Segment 8 and alternate routing to Segment 9 and assessed varying routing regarding constraints such as the Orchard Combat Training Center, the Halverson Bar non-motorized area, National Historic Districts, NHTs, the Snake River, and commercial and residential areas as well as additional recreation sites, such as Centennial Park. Following existing transmission lines and minimizing new road construction were key considerations in developing the Segment 9 Revised Proposed Route/Route 8H for the SEIS.

Segment 9 Revised Proposed Route (Alternative 1): The Segment 9 Revised Proposed Route would cross three AOIs in the SRBOP concerning VRM Class II managed land. The Segment 9 Revised Proposed Route is a 165.3-mile-long 500-kV single-circuit line that would connect the proposed Cedar Hill Substation with the Hemingway Substation. Primary siting considerations in the eastern portion of this segment were avoidance of irrigated farmland, dairy operations, and scattered residential development; avoidance of interference with the Jarbidge Military Operating Area; making use of the WWE corridor; and minimizing impacts to visual resources. In the western portion of Segment 9, the area near to and within the SRBOP, following existing transmission lines was a primary objective. Other concerns included minimizing impact to Bruneau Dunes State Park and scenic qualities associated with the Bruneau River, avoiding conflicts with the Saylor Creek Air Force Range and Military Operating Area, the Cove non-motorized area, the Oregon Trail and SRMA, the C.J. Strike SRMA, the Snake River SRMA, additional historic sites, sage-grouse leks, and crossing the SRBOP. For the entire line segment, placement of the transmission line on public land versus private land was an important issue with local stakeholders. Route 8H follows the same alignment as the Segment 9 Revised Proposed Route through the SRBOP. Eight other routes were considered in the 2013 FEIS.

Other Routes: Route 8H would follow the same alignment as the Revised Proposed Route in this area and would therefore cross the same AOI (BOP-1). Routes 9K, FEIS

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<sup>3</sup> Formerly named the Orchard Training Area.

Proposed 9, and 8G would not cross any AOIs in this RMP area. Neither Co-Preferred Alternative (Alternatives 2 and 5) would include the Segment 9 Revised Proposed Route or Route 8H; therefore, no amendments are proposed. The visual analyses for amendments that would be needed if one of these routes were selected (under Alternatives 1, 6, or 7) are presented below.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required.

Three VRM Class II management areas are crossed by the Segment 9 Revised Proposed Route/8H: one near the C.J. Strike Reservoir, one near Sinkers Butte, and another at the South Alternative Oregon Trail. The presence of a transmission line in these landscapes would not meet VRM Class II management objectives. To construct the proposed transmission line following the alignment for the Revised Proposed Route/8H, BLM action would be necessary to either modify visual classifications or allow the Project without changing the VRM class in order for the Project to be in conformance with the RMP. However, it was determined during the 2013 FEIS process that allowing the Project in the SRBOP would not meet the intent of the enabling statute of the SRBOP. The Proponents prepared an MEP, and additional recommendations were made by BLM resource managers in an effort to provide sufficient mitigation and enhancement opportunities to balance the effects of an additional transmission line. These included other habitat and resource improvements such that the Project could potentially be built without being in conflict with the enabling statute. These mitigation actions and additional measures are discussed in the SEIS.

The AOIs are described below in Sections 5.3.1 through 5.3.3.

### **5.3.1 AOI BOP-1/J-3 South Oregon Trail (Segment 9 Revised Proposed Route/Route 8H)**

The South Oregon Trail AOI is located north and south of the Snake River, beginning at the C.J. Strike Reservoir dam. This AOI overlaps both the SRBOP and Jarbidge RMP boundaries. The Segment 9 Revised Proposed Route leaves the FEIS Proposed 9 near Bruneau, Idaho, heading northwest for about 6 miles before intercepting the C.J. Strike Reservoir, at the junction of the Bruneau River and the Snake River. Land surrounding the reservoir has been designated as VRM Class II due to its scenic qualities and close proximity to the Oregon NHT. The route turns west, paralleling the Oregon NHT, and crossing the western end of the Narrows portion of the Bruneau Arm of C.J. Strike Reservoir, again as a double-circuit design. The route then continues in a general westerly direction on the south side of the reservoir, crossing back to the north side of the Snake River approximately 0.5 mile downstream from the C.J. Strike Reservoir dam. Except for minor detours to avoid agricultural land, the route continues west from the dam then turns to the northwest, crossing the SRBOP before re-joining the Proposed Route east of Hemingway Substation. Although not located within a WWE corridor, this route generally follows existing transmission lines. The portion of the AOI within the SRBOP RMP crosses a 330-acre parcel for 0.4 mile, a 587-acre parcel for 0.6 mile, a 195-acre parcel for 0.7 mile, a 142-acre parcel for 0.4 mile, and the western portion of a 3,859-acre parcel for 3 miles of land managed for VRM Class II objectives. A small parcel of VRM Class II just north of this area would also be crossed

for 0.3 mile. Figure 5.3-2 shows the viewshed of the South Oregon Trail AOI, the Segment 9 Revised Proposed Route/Route 8H, and VRM management classifications. Figure 5.3-3 shows the AOI and amendment management recommendations.

#### **5.3.1.1 Other Routes Considered**

The 2013 FEIS analyzed the Proposed Route and eight alternative routes in the western portion of Segment 9 as a means of connecting the Cedar Hill and Hemingway Substations. The 2013 FEIS Proposed Route is largely within the WWE corridor but crosses more private land than some other routes. The 2013 FEIS Routes 9D, 9F, 9G, and 9H are variations on an alignment identified by the Owyhee County Task Force and recommended by Owyhee County as its preferred route to avoid private land and maximize the use of public land. This alignment and substantially deviates from the designated WWE corridor and would cross the SRBOP. Route adjustments were made to avoid sage-grouse leks and non-motorized areas as well as other resources such as reducing impacts to the Oregon NHT. Routes 9K, 8G, and FEIS Proposed 9 avoid this area, as does FEIS Route 9E.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

#### **5.3.1.2 Existing Landscape Conditions**

The Snake River is the major water feature in the 15-mile-radius area surrounding the South Oregon Trail AOI. The river crosses the middle of the area from west to east and leaves the study area in the vicinity of Indian Cove. C.J. Strike Reservoir is located at the northern end of the Bruneau Valley in the center of the area. The topography is generally flat to rolling with numerous drainages. Although much of the area is undeveloped, there are large areas of farms and farmland along the Snake River, south of Mountain Home, and the Bruneau Valley and Twentymile Flat. SR 78 is the major road and generally follows the Snake River east to west. SR 51 extends north to south through the area. Communities, such as Grandview and Bruneau, are located along local highways and the Snake River. Mountain Home Air Force Base is located in the northeast portion of the study area. Numerous transmission lines cross this area. Potential viewing areas include highways, communities, historic sites and trails, and recreation areas such as Bruneau Dunes State Park. In the eastern portion of the AOI, a double-circuit structure would replace the existing structures. The surrounding landscape here is flat with buttes in the background. The existing structures are highly visible in the landscape.

Appendix E, Figure E.2-10a shows the existing landscape from KOP 1155 (also referred to as KOP C1155). This view represents the view of recreational users of the BLM's Cove Recreation Site at the C.J. Strike Reservoir and of the Oregon NHT. The KOP is located at the intersection of Route 78 and a graded gravel/dirt road. The views of the relatively flat to undulating terrain with plateau silhouettes in the background exhibit diversity in form line and texture. Existing human-made features include roads, agricultural field, and a wood-pole H-frame in the middleground and background. The trail swales are also visible in the view to the left.

Appendix E, Figure E.2-11a shows existing landscape conditions as viewed from KOP 1156. The area consists of rolling terrain that slopes toward the reservoir. An existing wood pole H-frame transmission line is evident in the view. More distant views toward the north are characterized by water and bluffs.

Appendix E, Figure E.1-3a shows the existing landscape from KOP C137, located on a portion of the Oregon Trail. The resource at this location consists of a deep swale 15 to 17 feet wide, as well as a shallow swale approximately 10 feet wide running parallel, and is marked with Carsonite posts (see Appendix J of this SEIS). Multiple existing power lines are highly visible from this location.

### 5.3.1.3 Conformance Analysis

Figure 5.3-2 shows the viewshed, KOPs, and other features within the 15-mile-radius study area. Scenic views of the C.J. Strike Reservoir and the surrounding Snake River Plain are available to sensitive recreational viewers at nearby locations including KOPs 1154 and 1156 and visitors to the Oregon NHT (KOP 1155). The views of the undulating to rocky terrain from these viewpoints exhibit diversity in form, line, and texture. Developments, such as high-voltage transmission lines and a dam, are in view as well. From these KOPs, it is apparent that the Segment 9 Revised Proposed Route would be visible in the foreground and middleground, sometimes skylined and at other times backdropped. In this location, the existing wood pole H-frame line would be replaced with a double-circuit 138/500-kV line.

Appendix E, Figure E.2-10b simulates the view from KOP 1155. High-sensitivity recreational viewers at KOP 1155 would have a high level of Project visibility (less than 0.5 mile from the Revised Proposed Route). The viewer would have an expansive view toward the alignment, which would not parallel any existing alignments or linear features and has the potential to skyline the view due to background terrain being too small of a scale to adequately absorb structures. The Project's design shares some similarities with existing structures in the area but would introduce new elements that are of different form and color. Due to the existing structures in the south, the distance of KOP 1155 from the Revised Proposed Route, and the cumulative effect of adding new structures in an area with numerous vertical human-made elements, the contrast for this KOP is assessed as moderate. The Project's elements would draw the attention of the casual observer but would not dominate the setting. Potential visual impacts on recreational viewers and drivers from this KOP and in the general vicinity are expected to be moderate to high due to the Project creating a new highly visible linear feature of high contrast in a landscape with moderate to high scenic quality.

Appendix E, Figure E.2-11b simulates the landscape conditions, showing the Segment 9 Revised Proposed Route as viewed from KOP 1156. High-sensitivity recreational viewers at KOP 1156 would have a moderate level of Project visibility (approximately 0.4 mile from the Revised Proposed Route). The viewer would have a partially screened view toward the alignment, which would parallel an existing alignment. Contrast levels are anticipated to be low to moderate. Potential visual impacts on recreational viewers from this KOP and in the general vicinity are expected to be moderate due to existing disturbance, partial screening, and Class B scenic quality.



Screening and other mitigation efforts would be only moderately successful at lowering impacts to scenic resources in the surrounding area. The undulating and rugged terrain with mottled and diverse vegetation and the expansive waters of the reservoir would be moderately contrasted by an additional set of structures.

Appendix E, Figure 1-3b simulates the view from KOP C137. This view represents those of visitors to the Oregon NHT. The location is not in the more heavily used recreational locations but does represent a historic resource. The simulated view includes replacement of the existing H-pole structure with the double circuit structures. These would be larger than the existing structures and be highly visible from the KOP, with the nearest tower one-tenth of a mile away. These structures would be highly visible to the casual observer and create contrast with the existing landscape; however, due to existing cultural modifications, they would not reduce the overall Scenic Quality Rating for the cultural Analysis Unit (see Appendix J of the SEIS). These modifications, however, would not conform to the VRM Class II designation.

These additions would draw the attention of the casual observer and represent a deviation from the natural form, line, color, and texture of the surrounding landscape; and therefore would not conform to VRM Class II objectives. It would appear that VRM Class II objectives have been assigned to this particular area to protect the Oregon NHT corridor and adjacent landscapes.

#### **5.3.1.4 Plan Amendment for Segment 9 Revised Proposed Route/Route 8H**

The Revised Proposed Route for Segment 9 and Route 8H include a 500-kV transmission line, as well as moving a 138-kV line into a double-circuit configuration through part of the AOI. Neither of these configurations would be compatible with VRM Class II objectives; therefore, the VRM Class II areas associated with the Oregon NHT and Snake River Canyon scenic areas that would be crossed by the transmission line, where the line would not conform to VRM Class II objectives, would be reclassified to be managed with VRM Class III objectives (see Figure 5.3-3).

#### **5.3.2 AOI BOP-2 Sinker Butte (Segment 9 Revised Proposed Route/Route 8H)**

The Sinker Butte AOI is located about 20 miles south of Kuna, Idaho, on the western portion of the Segment 9 Revised Proposed Route (Alternative 1) and Route 8H (Alternatives 6 and 7). This route is a variation of the routes developed through the SRBOP for the 2013 FEIS. FEIS Routes 9D, 9F, 9G, and 9H were developed to address recommendations from Owyhee County Taskforce and Owyhee County and providing options to avoid the Cove non-motorized area and other cultural resource considerations. The primary County siting criteria were avoidance of private land and maximizing the use of public land. In the vicinity of Sinker Butte, the Segment 9 Revised Proposed Route crosses Swan Falls Reservoir about 2 miles south of Swan Falls Dam. In this section of the Sinker Butte AOI, the route crosses one 16,759-acre parcel for a distance of approximately 3.6 miles on land managed by the BLM for VRM Class II objectives to protect scenic views of the Snake River and the area around the Oregon NHT. The RMP designates visual resource management for both the Oregon NHT and the Snake River Canyon as VRM Class II. Figure 5.3-4 shows the location of the Sinker Butte AOI, the Segment 9 Revised Proposed Route, and the associated VRM Class II

lands. Figure 5.3-5 shows the location of the AOI area, the Segment 9 Revised Proposed Route/Route 8H, and the associated VRM Class II lands.

### **5.3.2.1 Other Routes Considered**

Siting considerations for the part of the AOI crossed by the Segment 9 Revised Proposed Route/Route 8H are the same as for the South Oregon Trail AOI described in Section 5.3.1 above. In addition, the BLM, Owyhee Task Force, and Proponents focused on the specific crossing of the Snake River north of the Swan Falls Dam and closer to an existing transmission line crossing. The selected alignment results in crossing land managed for VRM Class II objectives that could not be avoided. The 2013 FEIS Proposed Routes for Segment 8 and 9 and Routes 8B and 9E would avoid the VRM Class II lands surrounding Sinker Butte AOI. In addition, Routes 8G, 9K, and the 2013 FEIS Segment 9 Preferred Route would avoid this area as they, like FEIS Route 9E, would avoid crossing the SRBOP in this area.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

### **5.3.2.2 Existing Landscape Conditions**

The 15-mile-radius area surrounding the Segment 9 Revised Proposed Route/Route 8H crossing of Sinker Butte AOI is bisected from northwest to southeast by the Snake River and its many buttes (see Figure 5.3-4). North and east of the river, the topography is mostly flat, while to the south and west, it is more rolling and rises up to the Owyhee Mountains. After crossing the Snake River, the route travels through the SRBOP where the landscape is flat to undulating, interrupted by buttes and rock features. The route would parallel the Oregon NHT for much of its length within the AOI. Most of the area is undeveloped; however, there are large irrigated agricultural areas with many farms in the area where Ada, Canyon, and Owyhee Counties come together near Murphy and at other scattered locations. SR 78 passes northwest to southeast on the west side of the Snake River. SR 45, located on the east side of the river, intersects SR 78 at Walters Ferry. There are a number of small communities such as Murphy and Melba and much of the area on both sides of the river is part of the SRBOP. Sensitive viewers include motorists, local residents, and visitors to the SRBOP, historic trails, and historic sites. Scenic views along the Snake River adjacent to Sinker Butte, such as those represented by KOPs 1115 and 1352, are important to sensitive residential viewers. Visitors to the Oregon Trail would be less than half a mile from the Project at KOP C91, and approximately 1.12 miles away at KOP C1527. Views from KOP 1597 represent the views of residential viewers on Warrick Road, looking north toward Sinker Butte. Open, panoramic views of the rocky terrain of buttes adjacent to the Snake River canyon, with little human-made development, are considered to have moderate to high scenic quality. Aesthetic landscape elements in the middleground views have variations of form, line, color, and texture, which increase the scenic quality. Few visible human-made alterations are visible within the landscape, which enhances the scenic quality.

Appendix J, Attachment D, Figure D-12a represents the view of visitors to the Oregon NHT. The resource includes at least two swales at this location (8 feet wide and up to 10 inches deep) marked with Carsonite posts. A two-track road is within the swale.

The landscape at this location is flat to gently rolling in the foreground and middle-ground with a mesa visible in the distant background. The vegetation is dominated by sagebrush with no high vertical elements.

Appendix E, Figure E.2-14a represents those views from KOP 1337 of recreational viewers at a scenic lookout adjacent to Swan Falls Dam looking southeast toward Sinker Butte across the Snake River. Open panoramic views of the rugged canyon terrain and meandering water feature are considered to have high scenic quality due to the variety in form, line, color, and texture as well as the scarcity of such views in the surrounding region.

Attachment B, Figure B-8 shows the existing conditions as viewed from KOP 1115.

### **5.3.2.3 Conformance Analysis**

Figure 5.3-4 shows the viewshed, KOPs, and other features within the 15-mile-radius study area used to establish the degree of consistency of the proposed transmission line with the existing VRM Class II land crossed for the Segment 9 Revised Proposed Route. Appendix J, Attachment D, Figure D-12b simulates the view of visitors to the NHT or users of the two-track road that is aligned with the trail at this location. The Segment 9 Revised Proposed Route/Route 8H would be visible in the middleground as a new vertical element in the landscape. There would be little to no screening from landscape elements at this location. Appendix E, Figure E.14-2b simulates the view for high-sensitivity recreational viewers visiting the overlook above Swan Falls Dam at KOP 1337 who would have a moderate level of Project visibility from approximately 1.3 miles away, looking southwest toward the Revised Proposed Route/Route 8H, which represents a foreground view. The presence of the existing transmission lines and Sinker Butte in the view toward Segment 9 would result in co-dominant Project elements and partial screening, resulting in contrast levels that would be moderate. Visual impacts on recreational viewers would be moderate due to distance and contrast levels.

As viewed from KOPs 1115, 1352, C1514, and C1527, the landscape around AOI BOP-2 exhibits little diversity in form, line, color, and texture. Views of the Snake River are not apparent from this area. Residential viewers at KOP 1115 would have low-moderate impact to their views due to distance and partial screening. The proposed structures and access roads would result in low to moderate contrast with the undulating to flat terrain with blocky mesas and uniform vegetation and would not draw the attention of the casual observer from locations such as KOP 1352 over a mile away from the line. In this particular area, the distance of the Project from the viewer is an important factor impacting contrast levels but would still not meet VRM Class II objectives. Visual impacts to cultural resources on the Oregon NHT would occur and are represented by KOP C91; viewers on the trail would be less than half a mile from the Project. In addition, residential viewers on Warrick Road (KOP 1597) would have a high level of Project visibility, and visual contrast levels would be high due to the few human-made alterations and distance of the Project alignment. The rolling topography in the vicinity as well as distant mountainous silhouettes may offer opportunities for backdropping, which could absorb the lattice structures and lower contrast levels but not likely from this close distance. Visual impacts on viewers would be high.

If the Segment 9 Revised Proposed Route/8H is selected, structures should be microsit to minimize the visibility from the VRM Class II area. A 500-kV powerline would not be compatible with VRM Class II objectives. If this route is selected, it is recommended that the VRM Class II areas associated with the Snake River Canyon and Sinker Butte scenic areas that would be crossed by the route be reclassified to be managed with VRM Class III objectives.

#### **5.3.2.4 Plan Amendment for Segment 9 Revised Proposed Route/Route 8H**

Due to the proximity of the Oregon NHT, there is a potential for a fairly high visual impact from this route and therefore it would not conform to the VRM Class II objectives. An amendment would be needed for this routing under Alternatives 1, 6, and 7. If this route is selected, it is recommended that an area 250 feet from the centerline of the transmission line be reclassified to VRM Class III. This corridor would maintain a distance of at least 0.5 mile around the NHT, except where it crosses the trail. Micrositing should be used to lessen visual impacts as much as possible.

#### **5.3.3 AOI BOP-3 Guffey Butte (Segment 9 Revised Proposed Route/Route 8H)**

The Guffey Butte AOI is located about 10 miles east of Hemingway Substation where several proposed and additional routes for Segments 8 and 9 of the 2013 FEIS come together. The Segment 9 Revised Proposed Route (Alternative 1)/Route 8H (Alternatives 6 and 7) crosses the Guffey Butte AOI. This AOI is where the route crosses an 11,517-acre parcel of VRM Class II lands for 5.6 miles. This alignment is south of the area crossed by the 2013 FEIS Proposed Route for Segment 8 (which crossed the parcel for 4.2 miles), just south of FEIS Route 9D (which crossed the parcel for 3.7 miles) and similar to, but just north of, FEIS Route 9G (which crossed the parcel for 5.3 miles).

Figure 5.3-6 shows the viewshed for the Segment 9 Revised Proposed Route/Route 8H. Figure 5.3-7 shows the location of the Guffey Butte AOI, the Segment 9 Revised Proposed Route/Route 8H, and the VRM Class II lands with amendment management recommendations.

#### **5.3.3.1 Other Routes Considered**

The 2013 FEIS discussed the rationale for the alignments for routes crossing the SRBOP. Constraints considered in the development of those routes included avoiding areas of increasing development north of the Snake River, Centennial Park, and visual impacts to the Snake River and provide alternate routing if FEIS Route 8E was selected. Other concerns involved avoiding non-motorized areas and maximizing use of public land. Crossing of land managed for VRM objectives would be avoided by selecting Route 9K (Co-Preferred Alternative 5, and Alternative 3) or FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternative 4), which avoid crossing the SRBOP in this area.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

### **5.3.3.2 Existing Landscape Conditions**

The 15-mile-radius area surrounding the Guffey Butte AOI is bisected from northwest to southeast by the Snake River. North and east of the river, the topography is mostly flat, while to the south and west it is more rolling and rises up to the Owyhee Mountains. Most of the area is undeveloped; however, there are large irrigated agricultural areas with many farms in the area where Ada, Canyon, and Owyhee Counties come together near Murphy and at other scattered locations. SR 78 passes northwest-southeast through the area on the west side of the Snake River. SR 45, which is located in the northwestern part of the study area, intersects SR 78 at Walters Ferry. There are a number of small communities such as Murphy and Melba, and much of the area on both sides of the river is part of the SRBOP.

This route would cross undulating terrain containing buttes and other rock features. The alignment would cross north of the town of Murphy as well as land near Murphy Rim. KOP C132 is looking northwest towards the alignment for Segment 9 Revised Proposed Route. The foreground and middleground are flat with buttes and undulating landforms in the background.

Appendix E, Figure E.1-1a illustrates the existing landscape as viewed from KOP C132 with flat terrain in the foreground and middleground and buttes and undulating landforms in the background. There is minimal evidence of human disturbance.

Appendix E, Figure E.1-2a illustrates the existing landscape as viewed from KOP C133. This KOP is located on the eastern branch of a segment of the Oregon NHT – South Alternate route within the SRBOP, approximately one mile north of where it forks, following Rabbit Creek to the northeast. This portion of the trail continues north following Rabbit Creek. The KOP is approximately 0.2 mile south of the nearest tower for the Segment 9 Revised Proposed Route.

Appendix J, Attachment D, Figure D-7a represents the view from the NHT where the line would cross. The resource includes a subtle swale, measuring 3 inches deep and 6 feet wide, with some braiding (see Appendix J). The foreground is flat to subtle rolling topography with scattered shrubs and low grasses while the middle and distance are dominated by the mesa topography with low vegetation. No strong vertical features are present in the landscape.

Attachment B, Figure B-9 shows another view from KOP C90 emphasizing the Oregon Trail ruts.

### **5.3.3.3 Conformance Analysis**

Figure 5.3-6 shows the viewsheds, KOPs, and other features within the 15-mile-radius study area used to establish the degree of consistency of the proposed transmission line with the existing VRM Class II land crossed. Appendix E, Figures E.1-1b and E.1-2b simulate the Segment 9 Revised Proposed Route/8H in the existing landscape as viewed from KOPs C132 and C133, respectively. Due to the Project's proximity to these KOPs and the introduction of new elements to the resource's viewshed to the north, the VCR for this KOP is assessed as strong. The proposed Project elements from this alignment may dominate the setting or may draw the attention of the casual observer; therefore, there would be an adverse impact to the resource from the

Segment 9 Revised Proposed Route/Route 8H at this location. Appendix J, Attachment D, Figure D-7b simulates the view from faint swales where it crosses the NHT at KOP C1415. The line would be highly visible at this location, with the nearest tower approximately 400 feet away. The towers and conductors would attract the attention of the casual observer and would contrast with the existing elements. One tower would be in the near middleground while another would be skylined along the ridge of a nearby mesa.

Scenic views in the Striker Basin of Guffey Butte and the surrounding mountainous terrain are important to sensitive viewers such as hikers at the BLM trailhead (KOP 561) and the adjacent residences. From this vantage point, views of the Project would be partially screened, however, the Revised Proposed Route would still not conform to VRM Class II objectives due to some skylining structures that would be apparent in the middleground of the view. It would also contrast with the undulating silhouette lines and mottled vegetation. The alignment would cross north of the town of Murphy and could be visible along Murphy Rim. Additionally, the alignment would parallel NHTs and cross VRM Class II lands near historic sites (see Figure 5.3-7). The structures for the Segment 9 Revised Proposed Route would contrast with the pyramidal forms as well as the flat to rolling expanse of the existing landscape. Contrast with form and texture as well as proximity to historic sites would draw the attention of the casual observer, thus not conforming to VRM Class II objectives.

#### **5.3.3.4 Plan Amendments for Segment 9 Revised Proposed Route/Route 8H**

If the Segment 9 Revised Proposed Route (Alternative 1)/Route 8H (Alternatives 6 and 7) is selected, an amendment would be needed for the Project to comply with the SRBOP RMP. A 500-kV powerline would not be compatible with VRM Class II objectives; therefore, a corridor 250 feet from the centerline of the proposed powerline would be established with a Class III VRM. This corridor would maintain a distance of at least 0.5 mile from the NHT, except where it crosses the trail. Micrositing may be needed to ensure a proper buffer distance from the NHTs. If the route is selected, it is recommended that the Proponents be required to microsite structures to minimize the visibility.



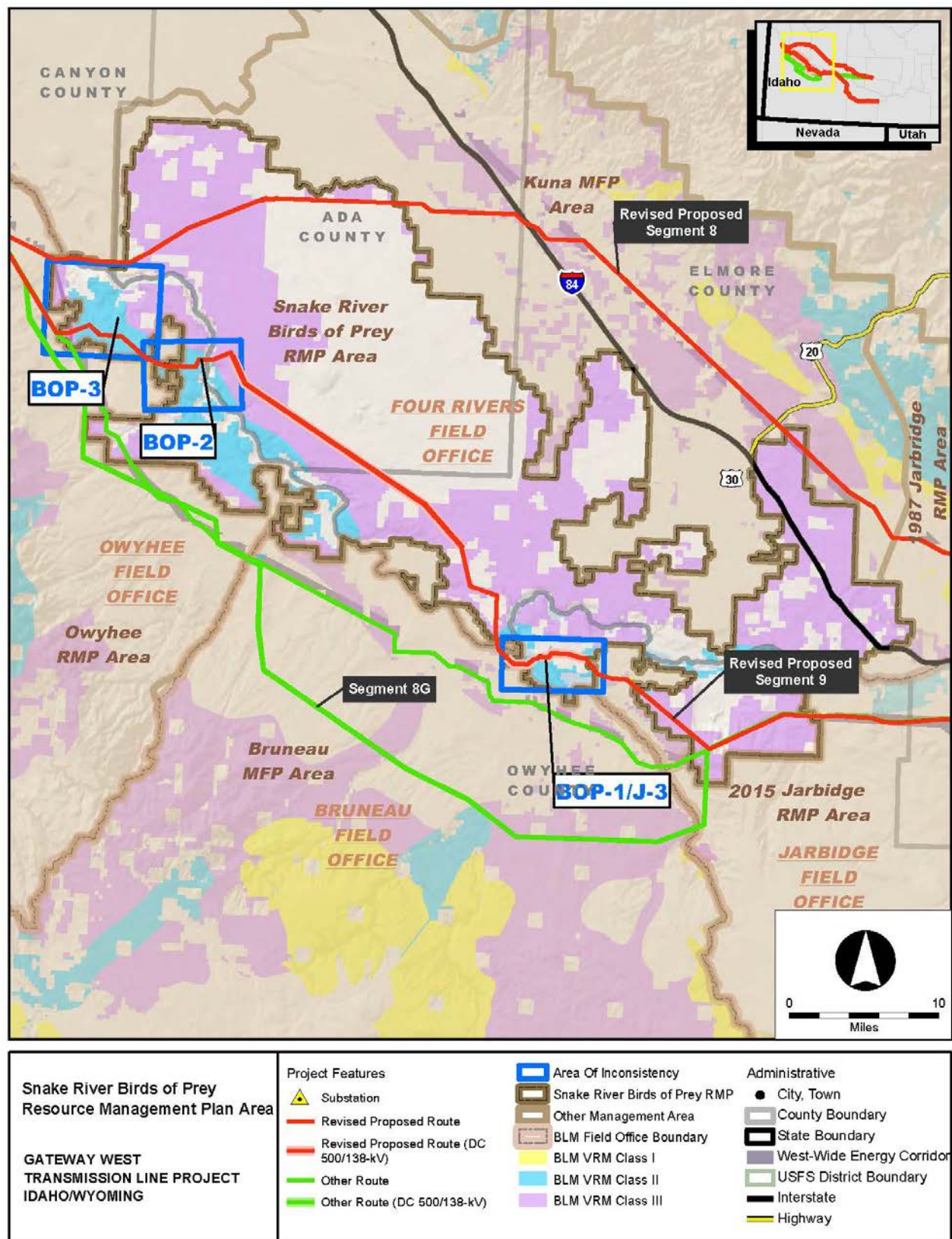
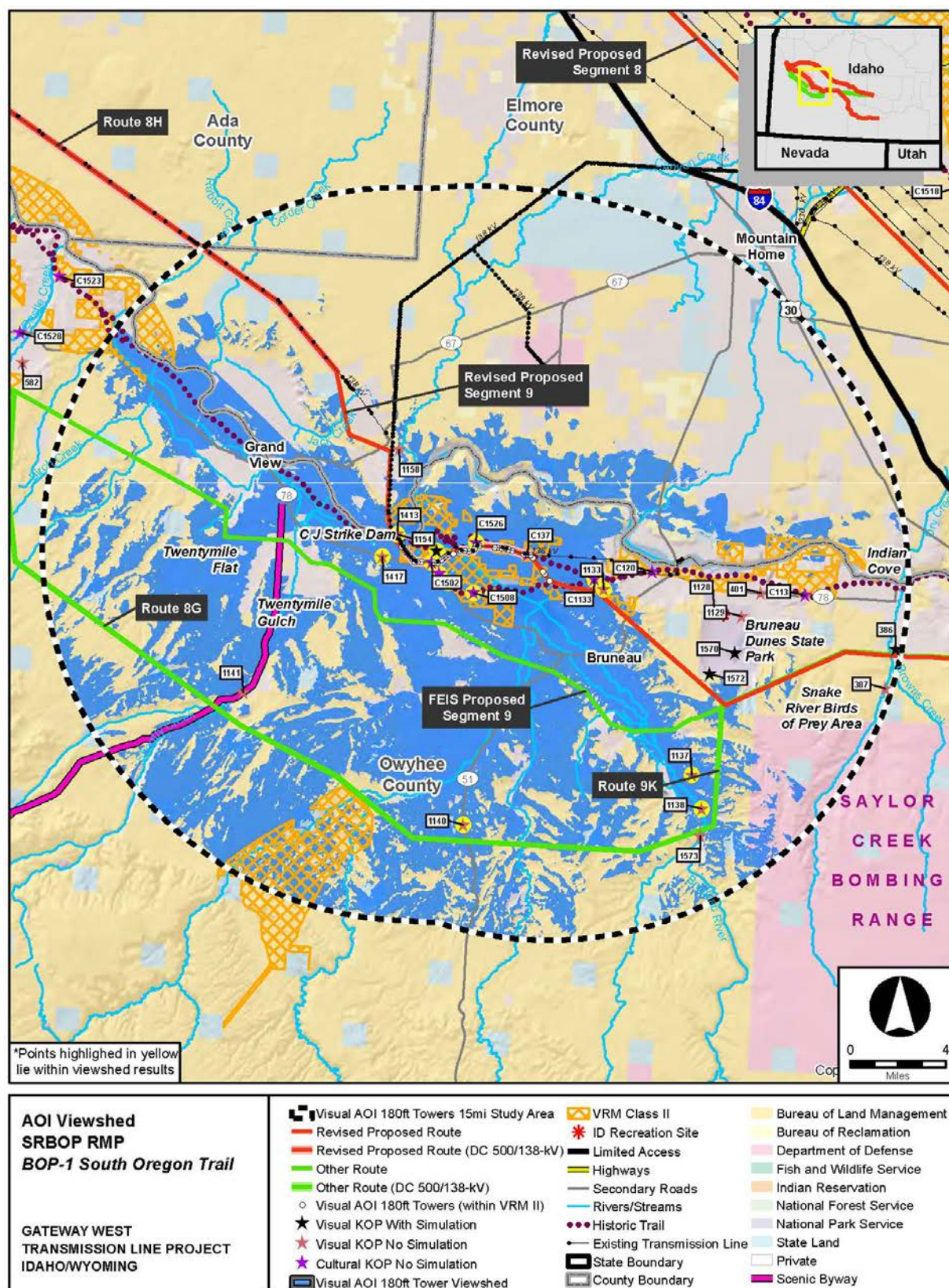


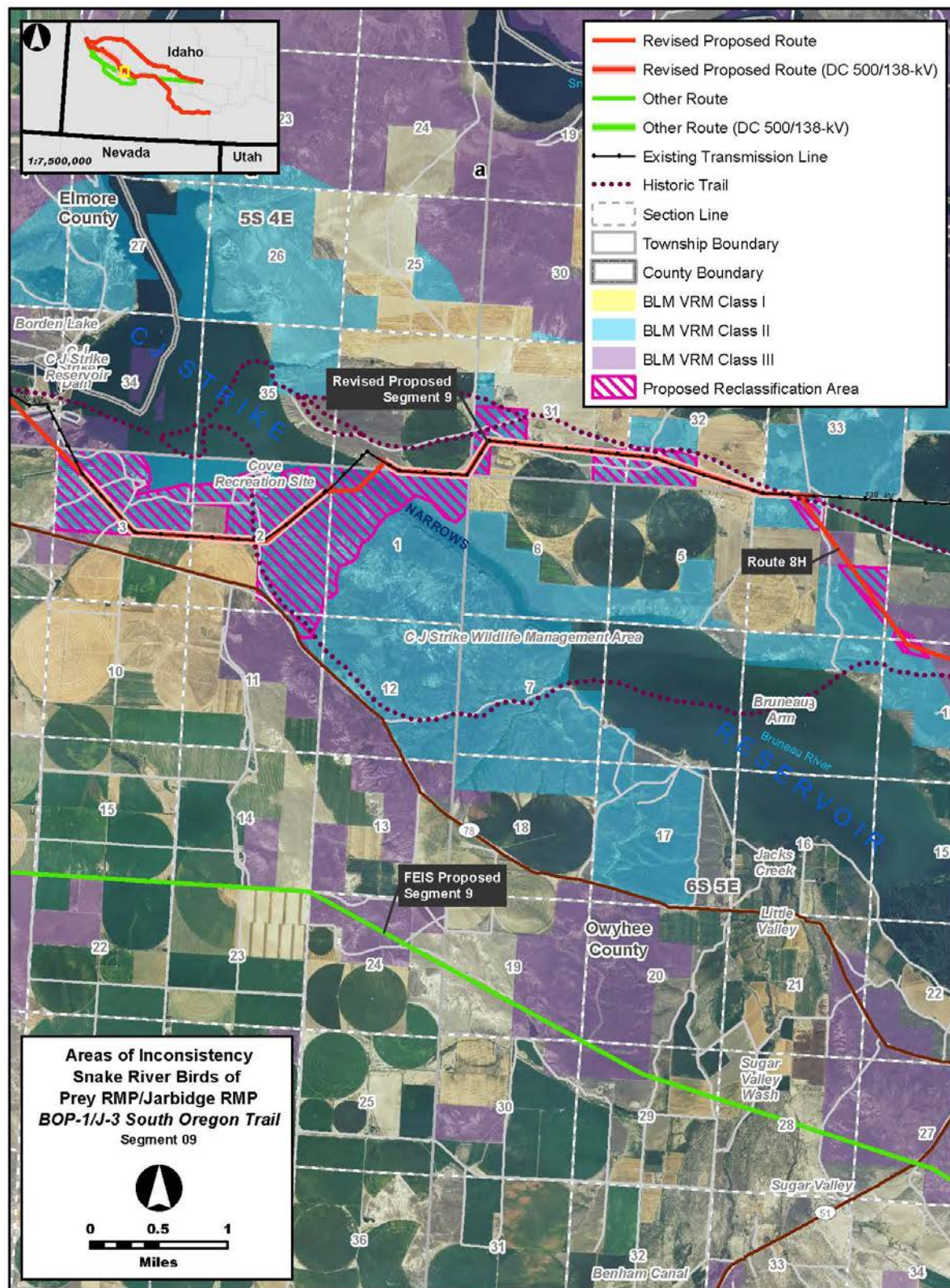
Figure 5.3-1. SRBOP RMP Boundary Map





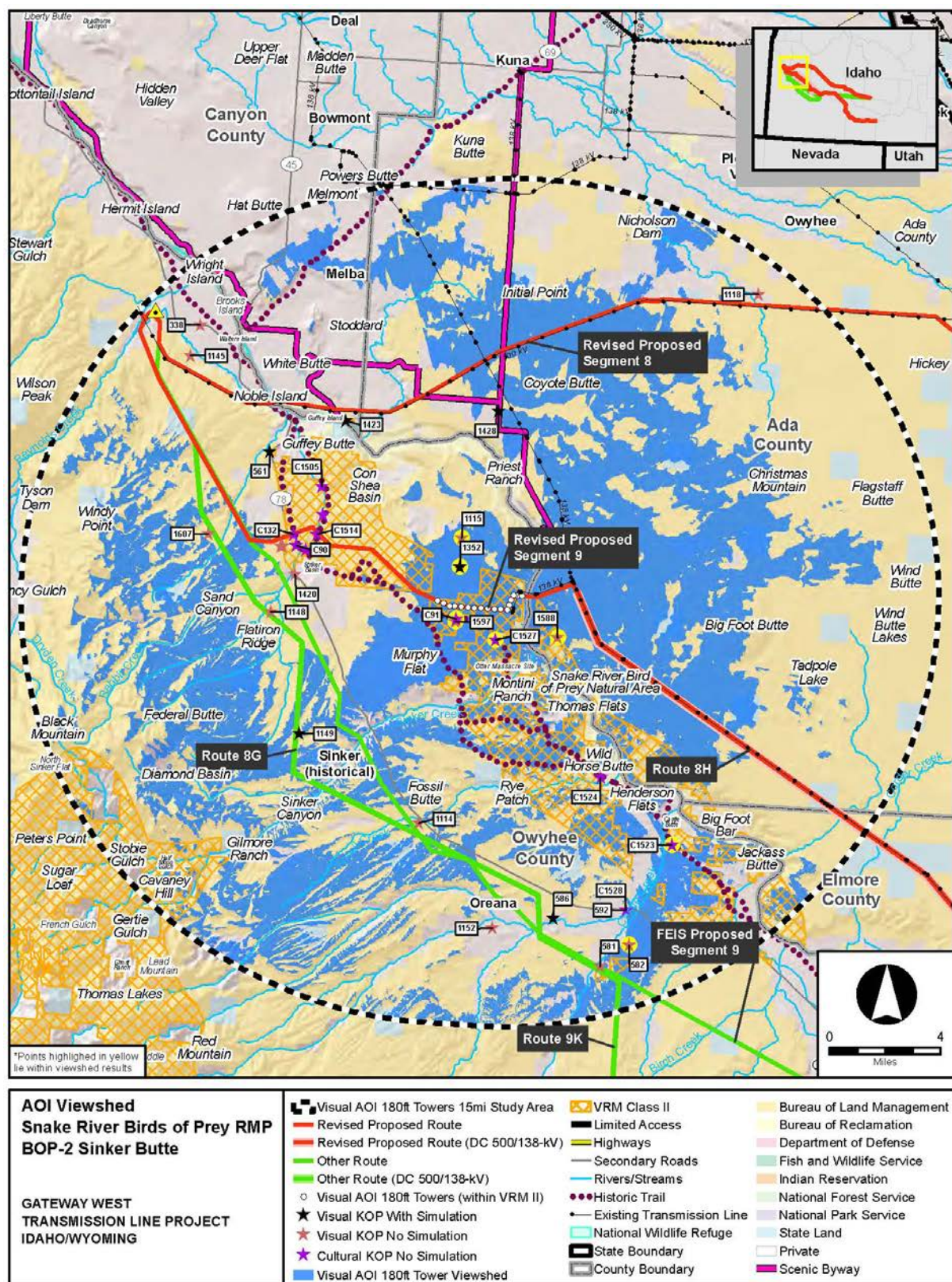
**Figure 5.3-2.** AOI BOP-1/J-3 South Oregon Trail Visual Analysis for the Segment 9 Revised Proposed Route/Route 8H





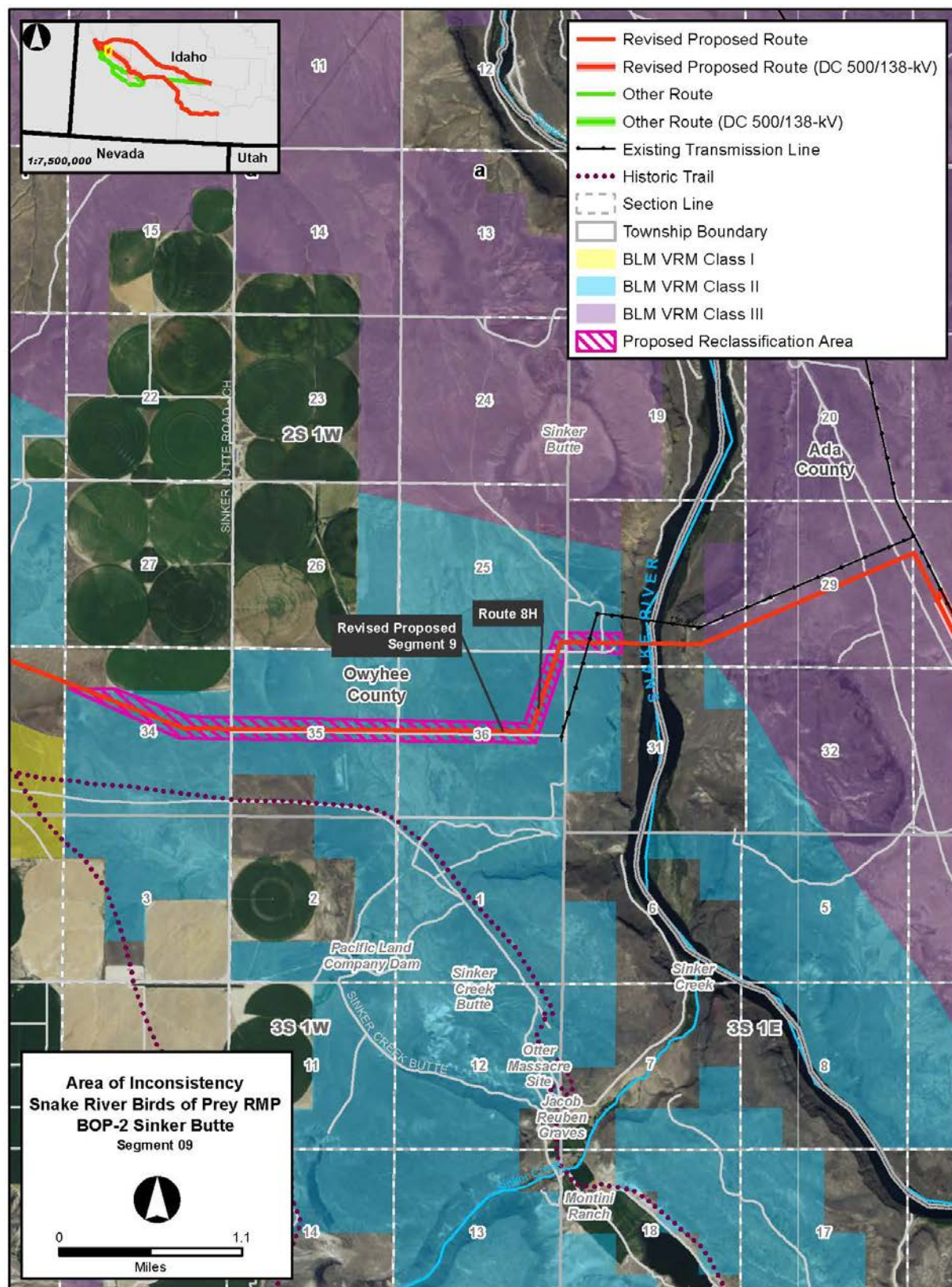
**Figure 5.3-3.** AOI BOP-1/J-3 South Oregon Trail Detailed Map Showing the Proposed VRM Action for Amendment SEIS-18 within the SRBOP RMP Planning Area





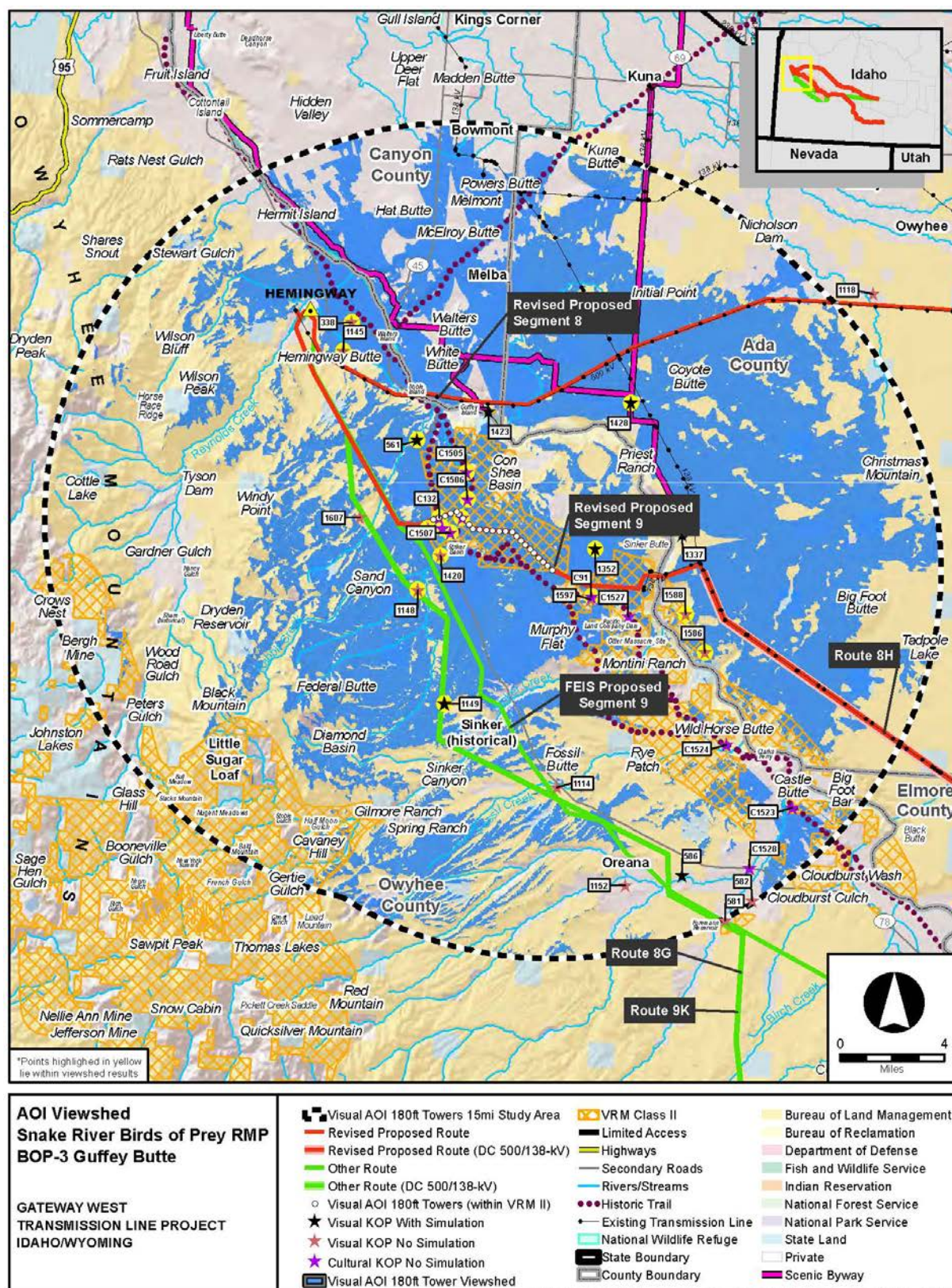
**Figure 5.3-4.** AOI BOP-2 Sinker Butte Visual Analysis for the Segment 9 Revised Proposed Route/Route 8H





**Figure 5.3-5.** AOI BOP-2 Sinker Butte Detailed Map Showing the Proposed VRM Action for Amendment SEIS-15 within the SRBOP RMP Planning Area





**Figure 5.3-6.** AOI BOP-3 Guffey Butte Visual Analysis for the Segment 9 Revised Proposed Route/8H





**Figure 5.3-7.** AOI BOP-3 Guffey Butte Detailed Map Showing the Proposed VRM Action for Amendment SEIS-15 within the SRBOP RMP Planning Area

## 5.4 Bennett Hills/Timmerman Hills MFP

The Bennett Hills/Timmerman Hills MFP (BLM 1980) provides direction for management of Public Land within its boundaries under the jurisdiction of the Shoshone Field Office in south-central Idaho. The Bennett Hills/Timmerman Hills MFP Planning Area consists of approximately 892,000 acres in Blaine, Camas, Elmore, Gooding, and Lincoln Counties (see Figure 5.4-1). The Bennett Hills/Timmerman Hills MFP includes objectives and recommendations for the following activities: lands, minerals, recreation, wildlife, range management, and watershed management.

The MFP includes Recreation Objective R-4, with a stated goal to “Manage the visual resources within the Planning Area in conformance with the guidance in BLM Manual 6310.18 B-E.” BLM Manual 6310.18 states that the cited guidance is to be used as tentative minimum management objectives. If these objectives can be met, no further or more detailed objectives are considered necessary. The following classifications appear in the MFP, which are equivalent to the BLM visual classes presented in Section 1.0 of this appendix.

“R-4.1 VRM Class II As a guideline, no management activity should be allowed to cause any evident changes in the form, line, color, or texture that is characteristic of the landscape within Class II areas, utilizing concealment, repetition of elements, minimizing surface disturbance, etc. to meet the goal.

R-4.2 VRM Class III As a goal, management activities may cause changes in the basic elements (form, line, color, texture) of the characteristic landscape, but the changes should remain subordinate to the existing visual character. Incorporate the methodology outlined in BLM Manual 6320 Visual Resource Contrast Rating.

R-4.3 VRM Class IV Changes caused by management activities may subordinate the original character but should reflect what could be a natural occurrence within the characteristic landscape.”

Approximately 15.7 miles of the Segment 8 Revised Proposed Route would cross BLM-administered land managed under the Bennett Hills/Timmerman Hills MFP, 6.5 miles of which cross VRM Class II lands, which would not conform to the VRM objectives within the Bennett Hills/Timmerman Hills MFP. AOI BH-1 Burnt Ridge was identified as an AOI because the Project would not conform to VRM Class II objectives for this area. Typically, the level of change to the characteristic landscape in VRM Class II areas would not allow for the presence of a transmission line.

Segment 8 Revised Proposed Route (Co-Preferred Alternative 2, and Alternatives 1 and 3): An amendment is proposed for AOI BH-1 for the Segment 8 Revised Proposed Route to change the VRM classification from VRM Class II to Class III.

The Segment 8 Revised Proposed Route is a 129.7-mile route north of the Snake River that connects the Midpoint and Hemingway Substations. The Segment 8 Revised Proposed Route would be constructed as single circuit 500-kV line. A key issue in Segment 8 is balancing between disturbing private agricultural land and publicly managed land with more resource constraints. Constraints on publicly managed land include historic trails, wetlands, steep slopes, and raptor nests. An important siting factor was following existing transmission line corridors. Of the several existing east-

west transmission lines, the Revised Proposed Route follows the existing transmission line with the least overall impact.

Additional Routes: None of the other routes analyzed in the SEIS cross this Field Office.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required.

#### **5.4.1 AOI BH-1 Burnt Ridge (Segment 8 Revised Proposed Route)**

The Burnt Ridge AOI is in the vicinity of King Hill, Idaho. It is located approximately 30 miles northwest of Midpoint Substation and approximately 3 miles north of Interstate 84. Much of the Segment 8 Revised Proposed Route in this area was located parallel to existing 230-kV transmission lines. This section of the route, however, also follows portions of the Oregon NHT. The Burnt Ridge AOI passes through four separate parcels of BLM-administered land managed for VRM Class II, ranging in size from 27 acres to 8,249 acres. The Project would cross a total of 6.5 miles of VRM Class II-managed land within the AOI. Figure 5.4-2 shows the location of the Burnt Creek AOI, the location of the Proposed Route, and the VRM management classification.

##### **5.4.1.1 Other Routes Considered**

Segment 8 was analyzed in the FEIS with the Proposed Route and five additional feasible routes. The Proponents attempted to avoid residential and agricultural land and to follow the WWE corridor or existing transmission lines when determining the route for Segment 8. The 2013 FEIS Route 8A followed a WWE corridor and would not cross the area managed under the Bennett Hills/Timmerman Hills MFP. The SEIS Routes 8G and 8H would proceed due west, into the Jarbidge RMP Planning Area, and would not cross the Bennett Hills/Timmerman Hills Planning Area. SEIS Route 8H follows the 8G alignment in this area and would therefore also not cross the Bennett Hills/Timmerman Hills Planning Area, but would cross VRM Class II land managed under the 1987 Jarbidge RMP and SRBOP RMP. In making a balanced routing decision that led to the selection of the proposed and other routes, crossing VRM Class II areas was unavoidable without causing greater overall effects. This AOI occurs for the Co-Preferred Alternative 2 and Alternatives 1 and 3 because all three alternatives include the Revised Proposed Route for Segment 8.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

##### **5.4.1.2 Existing Landscape Conditions**

The Snake River is the major water feature in the 15-mile-radius area surrounding the Burnt River AOI. It crosses the southern half of the area from west to southeast, leaving the Study Area in the vicinity of the Hagerman Wildlife Management Area. The flat to rolling topography on both sides of the river is cut by numerous drainages, some with steep, canyon-like walls. The northern part of the area is occupied by the steep terrain of the Mount Bennett Hills. Much of the area in the north is undeveloped. There are large areas of farmland along the Snake River in the southeast as well as Deadman



Flat, Black Mesa, and Pasadena Valley. Interstate 84, the major road in the area, passes east and then southeast through the Study Area. US 26 crosses the study area from east to west; and US 30 crosses north to south. Along these highways and the rivers there are a number of communities including Glenns Ferry, Bliss, and Hagerman. A number of historic trails cross the lower southwest half of the Analysis Area. A swale with shallow ruts is visible as part of the North Alternate Oregon Trail from KOP C85. Wooden H-frame towers are present within 0.25 mile south of KOP C85 and a single wood-pole transmission line is located 2.5 to 3 miles to the north. Numerous transmission lines run southeast to northwest through this area. In addition to the highways and communities, potential viewing areas include recreation areas such as Three Island Crossing State Park.

Attachment A, Figure BH-1a shows existing landscape conditions as viewed from KOP C84, which is located on a segment of the North Alternate Oregon Trail and is 0.8 mile southwest of the Segment 8 Revised Proposed Route. In this area, the trail is a two-track road that has been deepened by modern use. The setting contains a wooden, H-frame transmission line and ranching structures within 0.5 mile from the KOP. The topography along the western portion of AOI BH-1 along Segment 8 ranges from essentially flat to severe and canyon-like along King Hill Creek.

Attachment A, Figure BH-1c shows the existing wood pole H-frame transmission line that would be paralleled, as viewed from KOP C85. This KOP is located along the North Alternate Oregon Trail and would be approximately 900 feet northeast of the Revised Proposed Route of Segment 8. South of the Segment 8 Revised Proposed Route, and moving east, there is a substantial amount of irrigated agriculture and development, whereas north of the segment there is more undeveloped land.

#### **5.4.1.3 Conformance Analysis**

Figure 5.4-3 shows the viewshed, KOPs and other features within the 15-mile radius study area used to determine the degree of consistency with the existing VRM classification. KOPs C8 and C85 were selected because they are located on the Oregon NHT where VRM Class II objectives were assigned to protect from visual intrusion. Thus, conformance between the Project and visual management goals may be directly assessed.

Attachment A, Figure BH-1b simulates landscape conditions showing the Segment 8 Revised Proposed Route as viewed from KOP C84. The Project's design shares some similarities with existing structures in the area but would introduce new elements that are of different form, material, and texture. Due to these factors, the KOP's proximity to the route, and the potential for the elements to blend into the backdrop, the VCR for this KOP is assessed as weak to moderate. The proposed Project elements may draw the attention of the casual observer; therefore, there would be an adverse impact to the resource at this location.

Attachment A, Figure BH-1d shows the Segment 8 Revised Proposed Route in relation to an existing H-frame transmission line from KOP C85. The Segment 8 Revised Proposed Route would be located just to the north and parallel to the existing wooden, H-frame transmission line. The Project's design shares some similarities with existing structures in the area, but would introduce new elements that are of different form,

material, and texture. Due to these factors and the KOP's proximity to the route, the VCR for this KOP is assessed as moderate. The proposed Project elements would draw the attention of the casual observer; therefore, there would be an adverse impact to the resource at this location.

Scenic views of Kings Crown and the surrounding area north of King Hill are important to the surrounding sensitive viewers such as sensitive viewers along the Oregon NHT at KOPs C84 and C85. Many of the views in this area, including these particular KOPs, are interrupted by development and human-made features such as high voltage transmission lines and wind towers. Human development has changed the surrounding form, line, and texture of the adjacent views, representing a deviation from the natural setting. From these KOPs it is apparent that there will be some skylining and that screening and other mitigation efforts would not substantially lower the impacts to scenic resources in the surrounding area. The sweeping terrain, undulating forms, strong horizon line, and mottled vegetation are interrupted by existing human development. Impacts to cultural views are considered to be moderate. However, from views in the foreground and middleground, the Proposed Project structures and access roads would draw the attention of the casual observer, and thus not conform to VRM Class II objectives.

#### **5.4.1.4 Plan Amendment for Segment 8 Revised Proposed Route**

Due to the number of transmission lines and other development in the vicinity, an amendment is proposed for the Segment 8 Revised Proposed Route (in Co-Preferred Alternative 2) to reclassify the area within 3,000 feet north of the existing transmission line ROW from VRM Class II to VRM Class III (including the existing ROW). This VRM designation will better reflect the visual resource conditions of the area and allow the Project to conform to the MFP visual objectives. This amendment would also apply if Alternative 1 or Alternative 3 were selected.

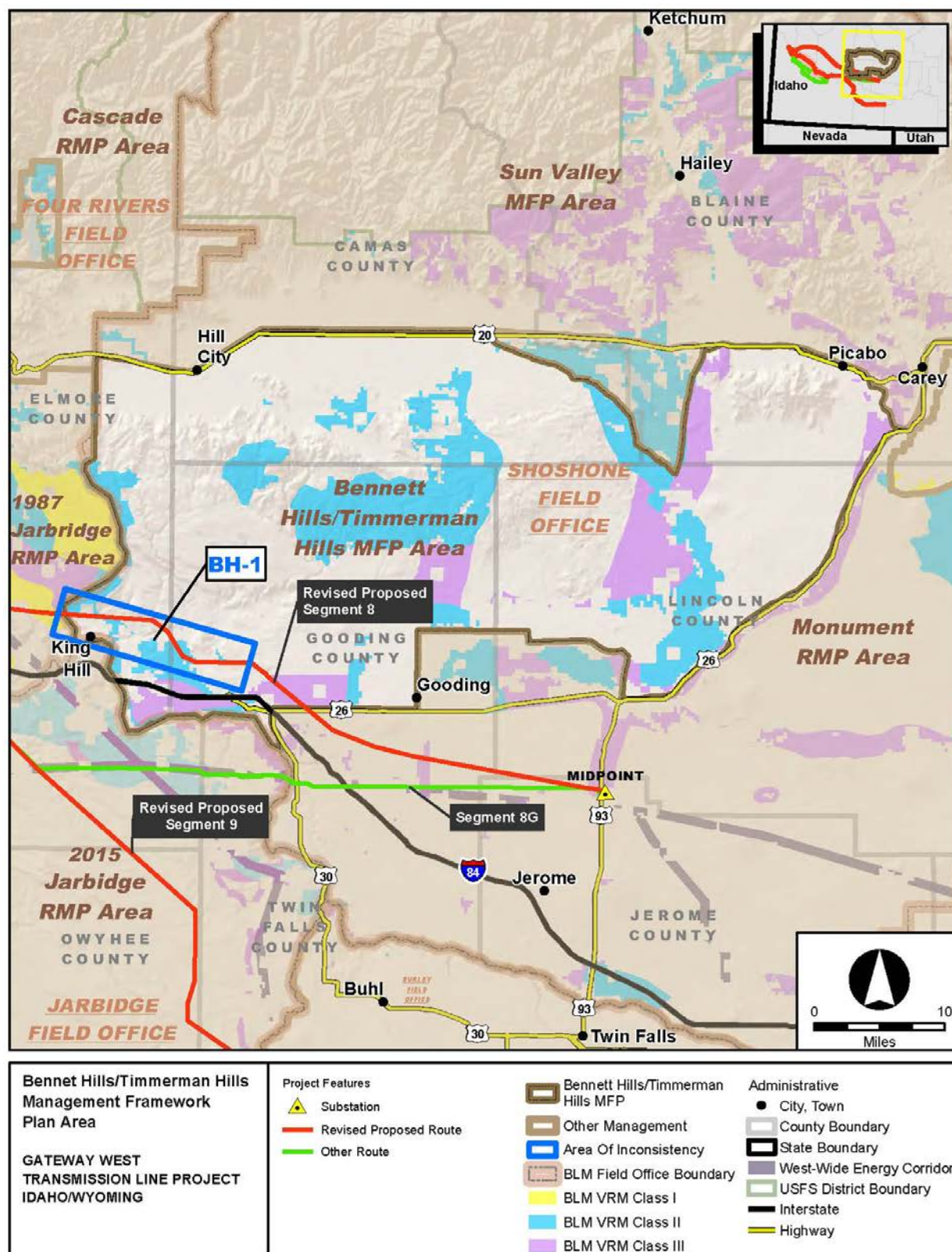
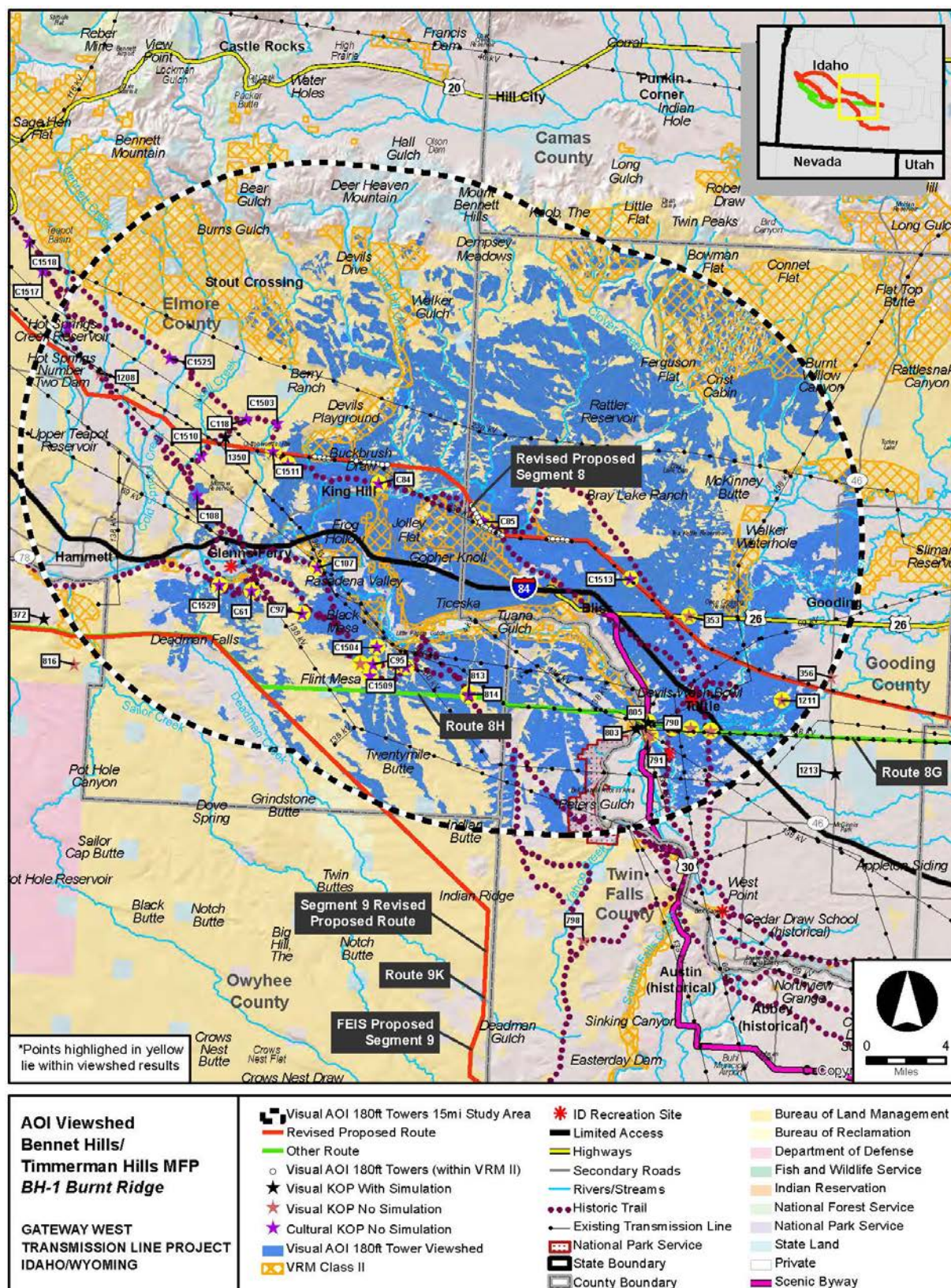


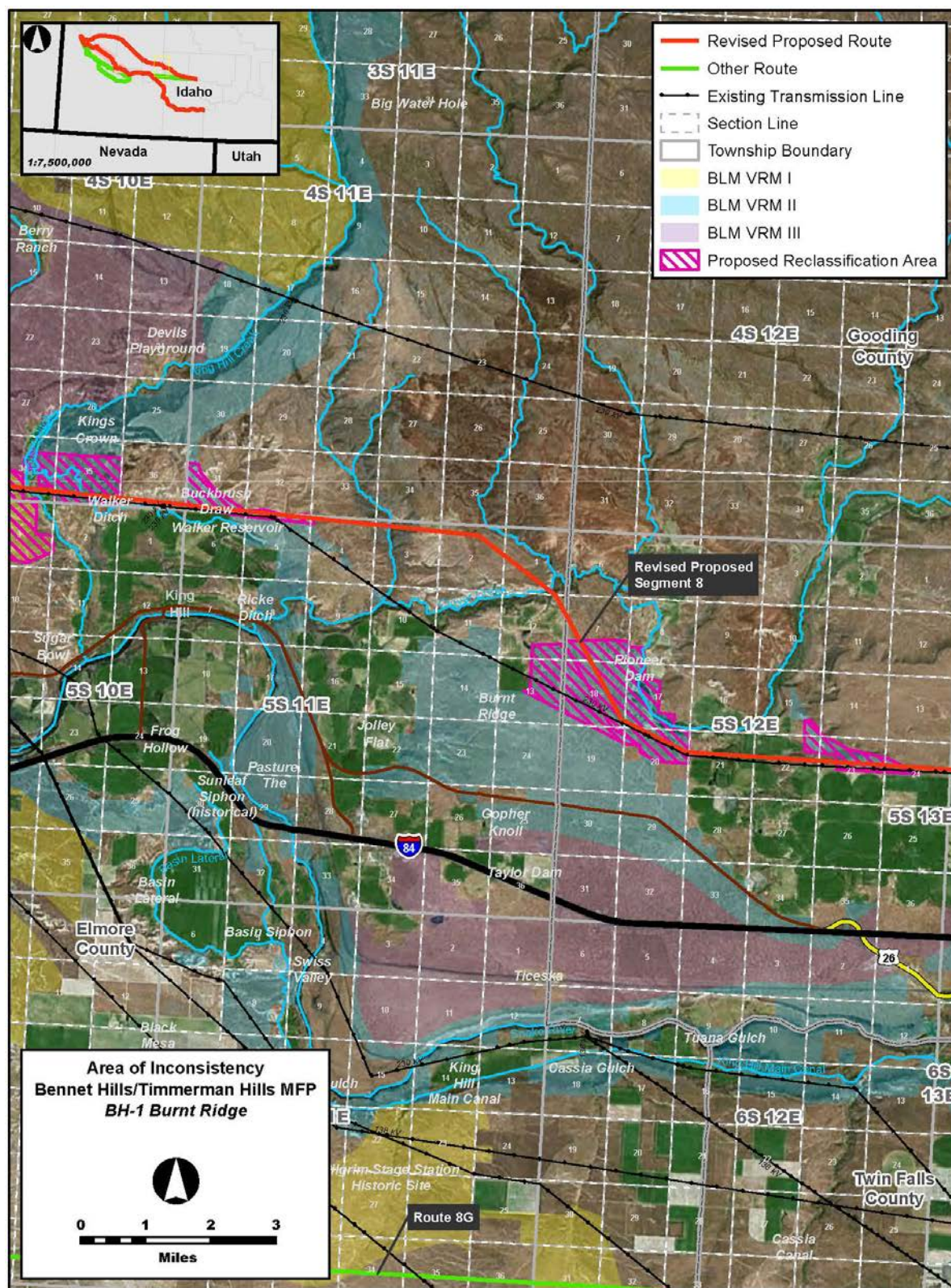
Figure 5.4-1. Bennett Hills/Timmerman Hills RMP Boundary Map





**Figure 5.4-2.** AOI BH-1 Burnt Ridge Visual Analysis for the Segment 8 Revised Proposed Route





**Figure 5.4-3.** AOI BH-1 Burnt Ridge Detailed Map Showing the Proposed VRM Action for Amendment SEIS-9 within the Bennett Hills/Timmerman Hills MFP Planning Area



## 5.5 Bruneau MFP

Actions that occur on lands managed by the Bruneau Field Office, including the granting of ROW under Title V of the Federal Land Policy and Management Act of 1976, are guided by decisions recorded in the Bruneau MFP (BLM 1983b). The Bruneau MFP currently restricts impacts to visual resources. Thus, the proposed Project does not conform to the Bruneau MFP as currently written:

“Manage all public lands in a manner which will protect and maintain the existing visual qualities, provide for enhancement where consistent with management policies, and provide for rehabilitation of land which presently do not meet the visual quality standards of surrounding lands. Use VRM contrast rating and project application design process for all management activities without unduly reducing commodity production or limiting program effectiveness.”

Both of the Co-Preferred Alternatives would cross land managed under the Bruneau MFP. For Co-Preferred Alternative 2, FEIS Proposed 9 crosses an area of VRM Class II land within a Section 368 corridor but would still require an amendment for visual resources. For Co-Preferred Alternative 5, both Routes 8G and 9K would cross the VRM Class II parcel outside of the corridor and an amendment would be required for visual resources.

Revised Proposed Route: The Segments 8 and 9 Revised Proposed Routes do not cross the Bruneau Field Office, and therefore AOI analysis for the Bruneau MFP is not applicable.

Other Routes: Routes 8G and 9K cross a parcel of VRM Class II land near Castle Creek, just south of the WWE corridor. In general, Routes 8G and 9K follow the WWE corridor on BLM-managed lands but frequently change direction on private segments to avoid rural residences, the small communities of Murphy and Oreana and, as much as possible, cultivated lands. Approximately 0.3 mile of Route 8G would cross VRM Class II land while approximately 0.4 mile of Route 9K would cross the parcel. An amendment would be needed for AOI B-1 to reclassify the VRM designation if they are selected.

FEIS Proposed 9 crosses the same parcel of land as Routes 8G and 9K; however, this alignment crosses the VRM Class II area within the WWE corridor. Approximately 33 miles of FEIS Proposed 9 would cross the area in the Bruneau Field Office within the WWE corridor, 17.6 miles of which are on BLM-managed land and 0.17 mile of which crosses the AOI. This route would also require an amendment associated with AOI B-1 to reclassify the VRM designation if it is selected.

No Action Alternative: Under the No Action Alternative, the Project would not be constructed. Therefore, Project objectives would not be met, but no Project-related plan amendments would be required.

### 5.5.1 AOI B-1 Castle Creek (Segments 8 and 9 – Routes 8G, 9K, and FEIS Proposed 9)

The Bruneau AOI is located on Routes 8G, 9K, and FEIS Proposed 9 to the east of Castle Creek, approximately 2 miles south of the SRBOP management boundary. Routes 8G, 9K, and FEIS Proposed 9 would cross a 282-acre VRM Class II parcel for approximately 0.3 mile and 0.4 mile, respectively. This AOI is a relatively isolated

parcel of VRM Class II management within a larger landscape of extensive agriculture, including pivot-irrigation. Figure 5.5-2 shows the viewshed for the Castle Creek AOI; Routes 8G, 9K, and FEIS Proposed 9; and the VRM classifications lands.

The VRI lists the area crossed by Routes 8G, 9K, and FEIS Proposed 9 in this AOI as Scenic Quality Unit 004 – Birch Creek Wash, which has a Scenic Quality Rating of C with low viewer sensitivity. Approximately 9.2 miles of the route would cross this unit, 0.2 mile of which would be in the AOI of VRM Class II. The unit is approximately 125 square miles, 34 square miles of which would be within 5 miles of the route crossing of the AOI. The majority of the land that is within the VRI unit, managed under the Bruneau MFP and within 5 miles of the AOI, is VRM Class IV with some Class III and the Class II of the AOI.

### **5.5.1.1 Other Routes Considered**

The Segments 8 and 9 Revised Proposed Routes and most of the other 2013 FEIS routes would avoid this AOI; however, the Segment 9 Revised Proposed Route would cross substantially more VRM Class II areas within the SRBOP. In the 2013 FEIS, Routes 9D through 9H would avoid this AOI. However, similar to the Revised Proposed Route for Segment 9, FEIS Routes 9D and 9F–9H would cross VRM sensitive lands within the SRBOP management area. FEIS Route 9E is south of this AOI and would not cross VRM Class I or II designated lands; however, very little of the route would be within the WWE corridor.

While no amendments would be needed for the No Action Alternative, not constructing the route would not meet the Project objectives.

### **5.5.1.2 Existing Conditions**

The topography in the 15-mile-radius analysis area for AOI B-1 is defined by undulating to dominant ridges and buttes such as Sinker Creek Butte dissected by broad, open valleys and meandering water bodies such as Castle Creek and the Snake River. The central and northern portions of the area have a series of drainages and ridges running north and south into the Snake River. The areas to the southwest of the Snake River Valley are more rugged with severe slopes such as near Red Mountain and Hayden Peak. The majority of the area is extensively farmed with pivot irrigation. Murphy, the most significant community in the area, is located in the north quadrant on the west side of the Snake River. Highway 45, which generally parallels the Snake River, crosses the area from northwest to southeast. An existing transmission lines crosses north to south through the area. Sensitive viewing areas include the Oregon NHT, the Snake River, Snake River Canyon Scenic Byway, Western Heritage Historic Byway, Owyhee Uplands Back Country Byway, Celebration Park, Swan Falls, and residences in Murphy and in the adjacent agricultural areas along the Snake River Plain.

Attachment B, Figure B-10 shows existing landscape conditions as viewed from KOP 581. The landscape in the foreground is flat to gently sloping and covered with grasses and riparian vegetation adjacent to Castle Creek. Rolling to rugged hills, such as Red Mountain, are seen in the background. There are visible water elements and a few human-made modifications in view, including Castle Creek Road and farm outbuildings immediately adjacent to the viewer. KOP 581 would be approximately 300 feet

northeast of FEIS Proposed 9 and about 550 and 800 feet northeast of 8G and 9K, respectively. Attachment B, Figure B-11 shows existing landscape conditions looking through the AOI toward the route from KOP 582, approximately 1.3 miles northeast of Routes 8G and 9K, and 1.2 miles northeast of FEIS Proposed 9. The view shows the flat topography in the foreground and middleground with mountains and buttes in the distance.

This AOI is located in the Scenic Quality Rating Unit 004 – Birch Creek Wash of the Bruneau Field Office VRI. The area has a long history of motorcycle racing and past use by the military as a missile base. Sand washes drain to the northeast from higher elevation ranges towards the Snake River throughout. The area has some erosive land features created by sand wash erosion of the sediments left from ancient Lake Idaho deposition. Because of these sediments and soils, rare plants and habitat are common throughout the rating unit although they would not be apparent to the average visitor traveling through the unit. As viewed from the KOPs, the visual resources are generally of a stark and sparsely vegetated landscape. While there are unique, albeit subtle, biologic resources and landforms in this area, the abundance of past disturbances including abandoned military installations and livestock management structures (trough/pipelines and fencing) detract from the visual resources of this unit. In addition, the lack of precipitation (5 to 7 inches in this zone) to provide for a more lush appearing vegetation community and lack of rugged topographic features, in combination with the abundance of non-native plants or weeds, as viewed by the average visitor to the area, result in a Class C rating.

#### **5.5.1.3 Conformance Analysis**

Figure 5.5-2 shows the viewshed from AOI B-1, VRM Class II managed lands, and other features within the 15-mile radius study area used to assess the whether the proposed project conforms the existing VRM class. Scenic views of the various buttes throughout the Snake River Plain as well as distant mountain ranges are important to sensitive residential viewers or recreational users visiting portions of the Oregon NHT adjacent to KOP 581. KOP 581 is located on a segment of the Oregon NHT approximately 300 feet northeast of FEIS Proposed 9 and about 550 and 800 feet northeast of 8G and 9K, respectively, as they follow the Snake River in a southeast to northwest direction. The view from KOP 581 provided in Attachment B, Figure B-10 is not facing the AOI, but is viewing adjacent lands, directly south of the KOP. The views of the flat to undulating terrain, background mountain silhouettes with mottled to clumped vegetation, and meandering waterbody exhibits diversity in form, line, color, and texture with few human-made features. The setting at this KOP is relatively undisturbed in all directions, except for roadway and a few adjacent wooden structures. From this KOP, the proposed Project would be partially screened by the ridge but would still skyline the mountainous views. The close distance of the Project from KOP 581 results in the features dominating the landscape with such prominence that the visual contrast would be strong. The view from KOP 582 (Attachment B, Figure B-11) represents views from residences and Castle Creek/Oreana Loop Road, approximately 1.3 miles north-northeast of the alignment within the AOI, where drivers and residences would have a partially obstructed view of the Project.

Co-Preferred Alternative 2 and Alternative 6 would result in a single 500-kV line (along the FEIS Proposed 9 alignment) crossing the VRM Class II designated land near Castle Creek within the WWE corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of these Alternatives are likely to be similar to those for Alternatives 3 and 7, but less than those from Co-Preferred Alternative 5 or Alternative 4.

Co-Preferred Alternative 5 would result in two parallel 500-kV lines (Routes 8G and 9K), 250 feet apart, crossing VRM Class II designated land near Castle Creek just south of the WWE corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of this Alternative are likely to be similar to those of Alternative 4, but greater than those from Alternatives 2, 6, 3, or 7.

Alternatives 3 and 7 would result in a single 500-kV line (Route 9K) across VRM Class II designated land near Castle Creek just south of the WWE corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of these alternatives are likely to be similar to those for Co-Preferred Alternative 2 and Alternative 6, but less than those from Co-Preferred Alternative 5 or Alternative 4.

Alternative 4 would result in two parallel 500-kV lines (FEIS Proposed 9 and Route 8G), approximately 800 feet apart, crossing VRM Class II designated land near Castle Creek. FEIS Proposed 9 would be within the WWE corridor, while 8G would be just south of the corridor. This would introduce new dominant structural elements into the view to the north that would draw the attention of the casual observer, and would deviate from the natural form, line, color, and texture; therefore, it would not conform to VRM Class II objectives. Visual impacts of this Alternative are likely to be similar to those for Co-Preferred Alternative 5, but greater than those from Alternatives 2, 6, 3, or 7.

Visual effects of Co-Preferred Alternative 2 and Alternatives 6, 3, and 7 would be a result of a single 500-kV line crossing the AOI, while Co-Preferred Alternative 5 and Alternative 4 would both have two parallel 500-kV lines crossing the AOI. Appendix E, Figure E.2-9a shows the existing conditions at KOP 1149, which, while quite a ways west of the AOI, allows us to compare visual effects of different line configurations. Appendix E, Figure E.2-9b shows the simulated conditions of a single transmission line from KOP 1149. Figure E.2-9c shows the simulated conditions of two parallel transmission lines from KOP 1149. While this KOP is not in the AOI, it shows a general effect of the Project from a distance similar to the routes as KOP 581. It is assumed that VRM Class II objectives have been assigned to this particular area in order to protect the Oregon NHT corridor as well as adjacent scenic resources.

#### **5.5.1.4 Plan Amendment for FEIS Proposed 9, Route 8G, and Route 9K**

If FEIS Proposed 9 (Co-Preferred Alternative 2 and Alternatives 4 and 6), Route 8G (Co-Preferred Alternative 5 and Alternative 4), or Route 9K (Co-Preferred Alternative 5 and Alternatives 3 and 7) is selected, an amendment to reclassify the entire 282-acre parcel (the VRM Class II area adjacent to Castle Creek) from VRM Class II to Class III (Figure 5.5-3) would be needed. The WWE corridor crosses this area, and converting the area to VRM Class III would be consistent with the use of the land for a high-voltage transmission line ROW.



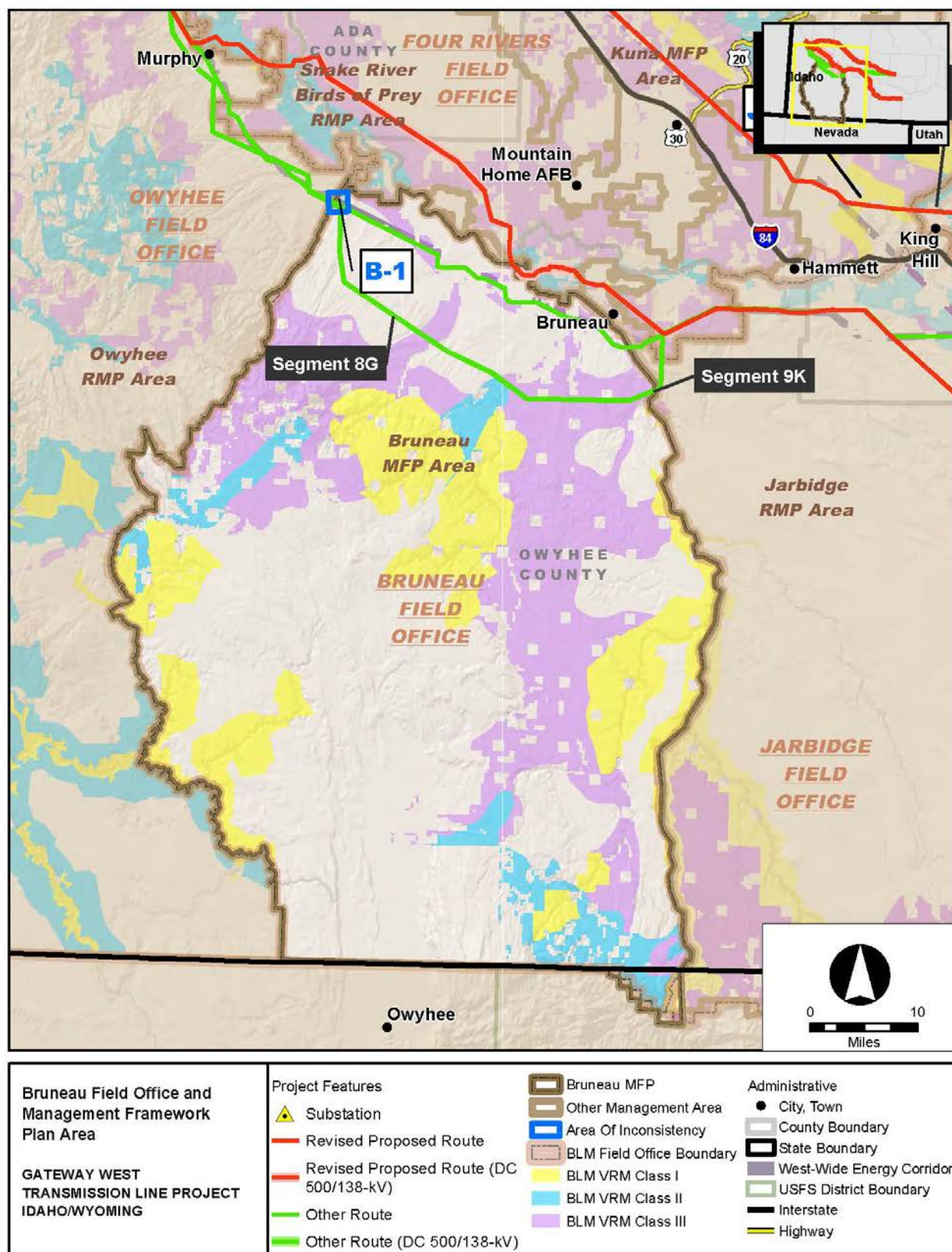


Figure 5.5-1. Bruneau MFP Boundary Map



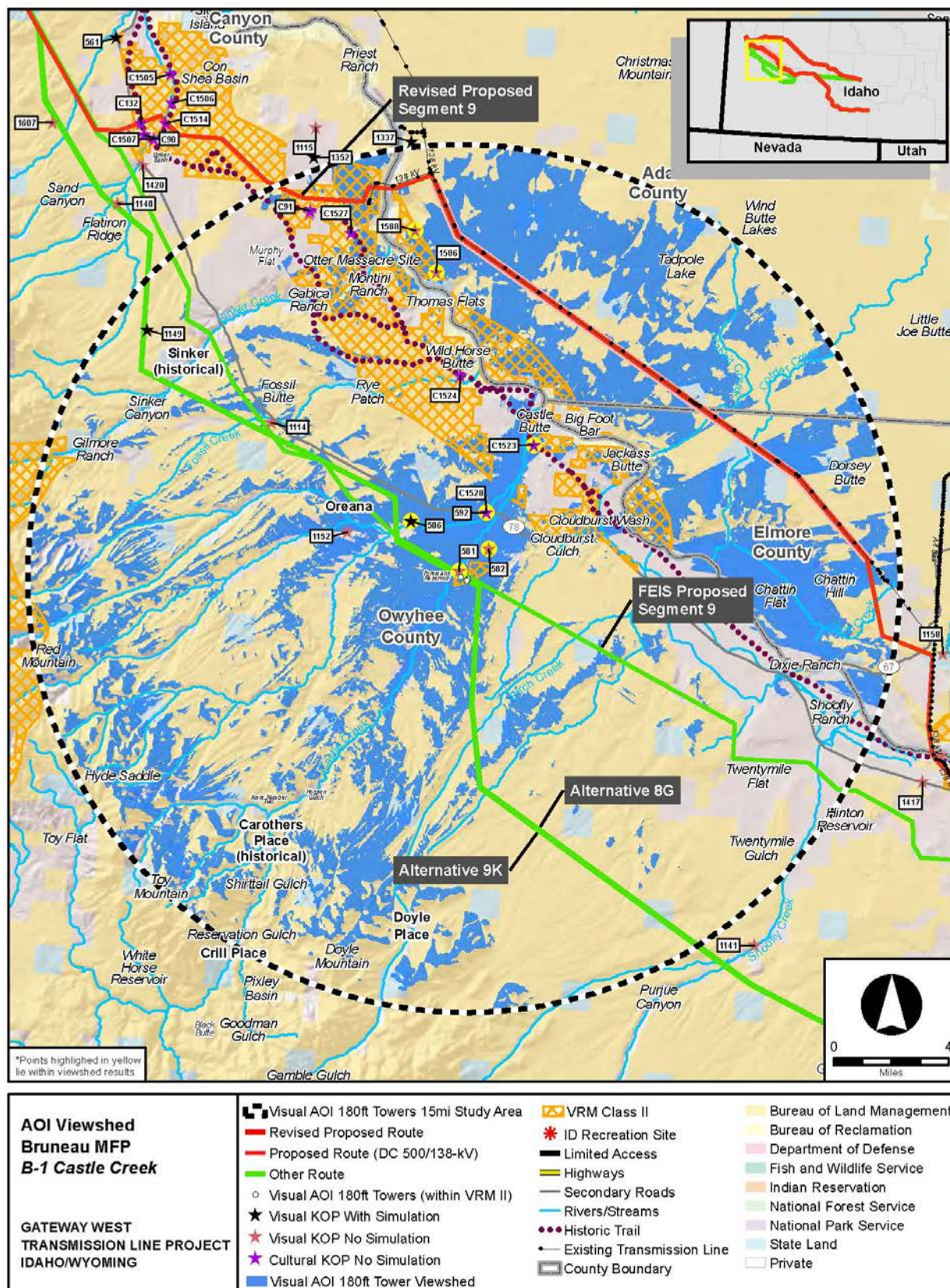
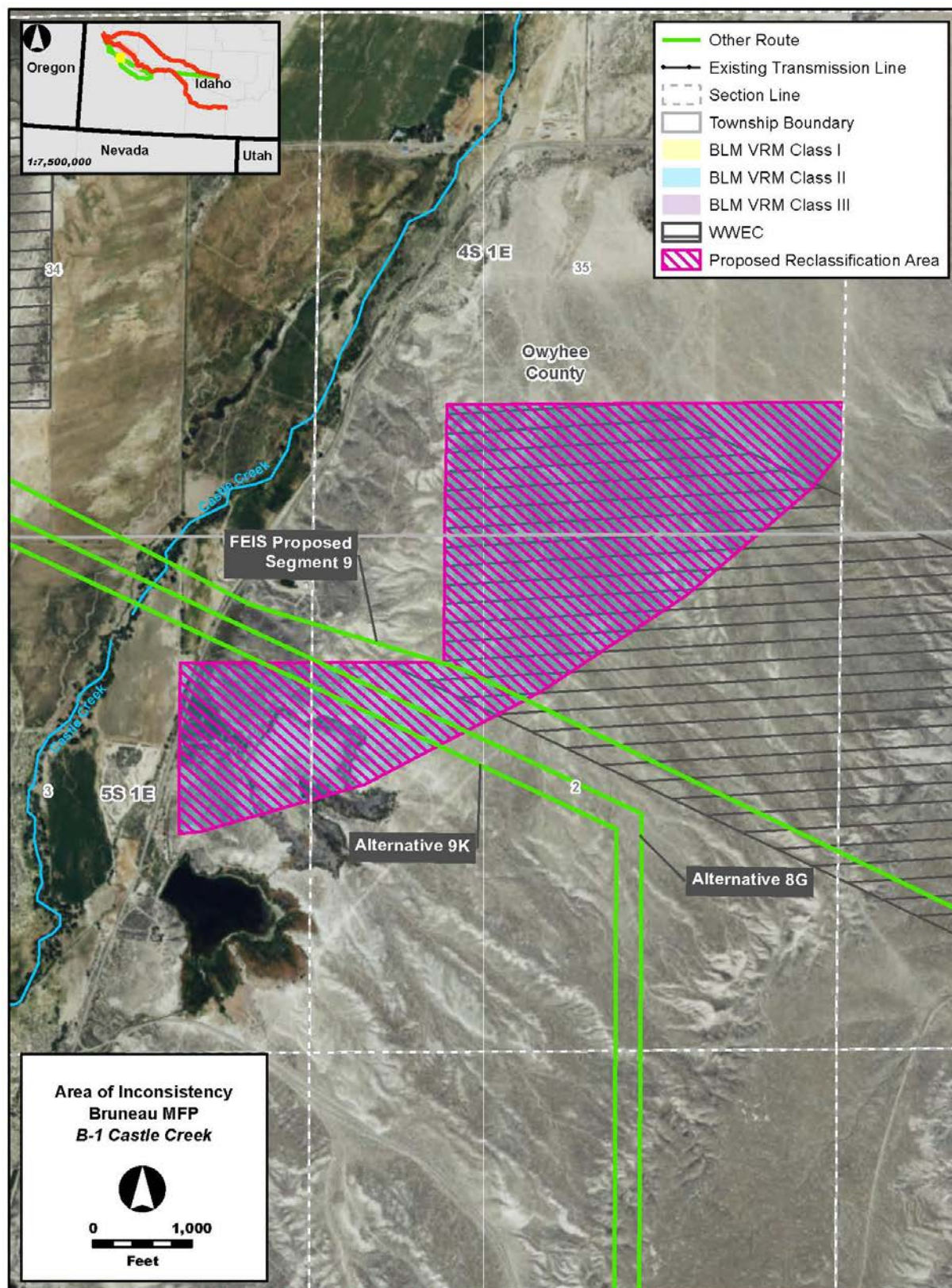


Figure 5.5-2. AOI B-1 Castle Creek Visual Analysis for Routes 8G and 9K





**Figure 5.5-3.** AOI B-1 Castle Creek Detailed Map Showing the Proposed VRM Action for Amendment SEIS-12 within the Bruneau MFP Planning Area

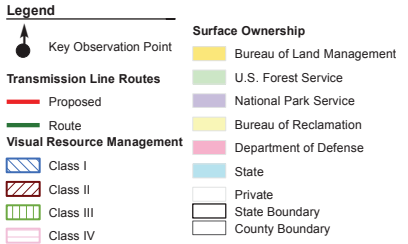
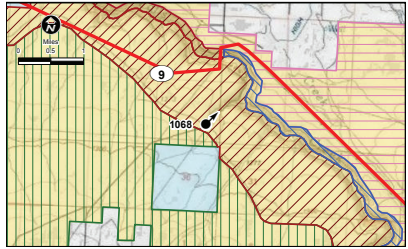
**Attachment A**

**Existing Conditions and Photographic Simulations**

## List of Simulations by Appendix G Sections

Section	AOI/ Figure No.	KOP Number	Figure Title
5.1	TF-1a	KOP 1068	Existing Conditions, Revised Proposed Route Segment 9/Route 9K
	TF-1b	KOP 1068	Photographic Simulation, Revised Proposed Route Segment 9/Route 9K
	TF-1c	KOP 1065	Existing Conditions, Revised Proposed Route Segment 9/Route 9K
	TF-1d	KOP 1065	Photographic Simulation, Revised Proposed Route Segment 9/Route 9K
5.2	J-5a	KOP 1350	Existing Conditions, Revised Proposed Route Segment 8
	J-5b	KOP 1350	Photographic Simulation, Revised Proposed Route Segment 8
	J-5c	KOP C83	Existing Conditions, Revised Proposed Route Segment 8
	J-5d	KOP C83	Photographic Simulation, Revised Proposed Route Segment 8
5.4	BH-1a	KOP C84	Existing Conditions, Revised Proposed Route Segment 8
	BH-1b	KOP C84	Photographic Simulation, Revised Proposed Route Segment 8
	BH-1c	KOP C85	Existing Conditions, Revised Proposed Route Segment 8
	BH-1d	KOP C85	Photographic Simulation, Revised Proposed Route Segment 8





**Photograph Information**

Time of photograph: 11:56 AM  
Date of photograph: 9-14-09  
Weather condition: Partly Cloudy  
Viewing direction: Northeast  
Latitude: 42°26'17.30"N  
Longitude: 114°52'22.00"W  
Distance: 0.8 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



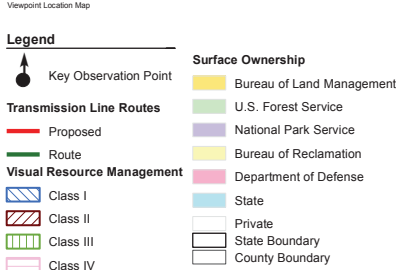
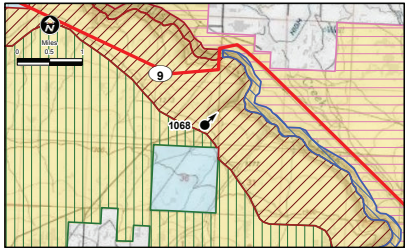
Existing Conditions  
from Key Observation Point 1068  
Segment 9 Revised  
Proposed Route/Route 9K

Gateway West  
500kV Transmission Project

Figure TF-1a



Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



**Photograph Information**

Time of photograph: 11:56 AM

Date of photograph: 9-14-09

Weather condition: Partly Cloudy

Viewing direction: Northeast

Latitude: 42°26'17.30"N

Longitude: 114°52'22.00"W

Distance: 0.8 Mile

Photographic Simulation  
from Key Observation Point 1068  
Segment 9 Revised  
Proposed Route/Route 9K

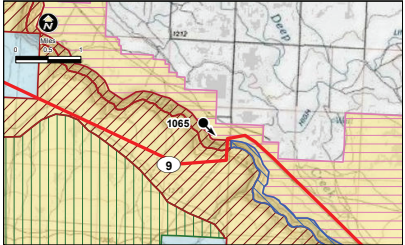
Gateway West  
500kV Transmission Project

Figure TF-1b





Above photograph is intended to be viewed 18 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped to show a wide angle of view with the above photograph's area shown in yellow.



- Legend**
- Key Observation Point
  - Transmission Line Routes**
    - Proposed
    - Route
  - Visual Resource Management**
    - Class I
    - Class II
    - Class III
    - Class IV

**Photograph Information**

Time of photograph: 12:08 PM  
 Date of photograph: 9-14-09  
 Weather condition: Cloudy  
 Viewing direction: Southeast  
 Latitude: 42°27'30.816"N  
 Longitude: 114°52'36.79"W  
 Distance: 0.5 mile

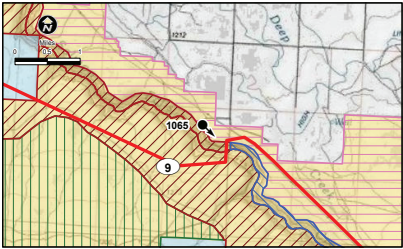
Existing Conditions  
 from Key Observation Point 1065  
 Segment 9 Revised  
 Proposed Route/Route 9K

Gateway West  
 500kV Transmission Project

Figure TF-1c



Above photograph is intended to be viewed 18 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped to show a wide angle of view with the above photograph's area shown in yellow.



- Legend**
- Key Observation Point
  - Transmission Line Routes**
    - Proposed
    - Route
  - Visual Resource Management**
    - Class I
    - Class II
    - Class III
    - Class IV

**Photograph Information**

Time of photograph: 12:08 PM  
 Date of photograph: 9-14-09  
 Weather condition: Cloudy  
 Viewing direction: Southeast  
 Latitude: 42°27'30.816"N  
 Longitude: 114°52'36.79"W  
 Nearest tower in view: 0.45 Miles

Photographic Simulation  
 from Key Observation Point 1065  
 Segment 9 Revised  
 Proposed Route/Route 9K  
 Gateway West  
 500kV Transmission Project

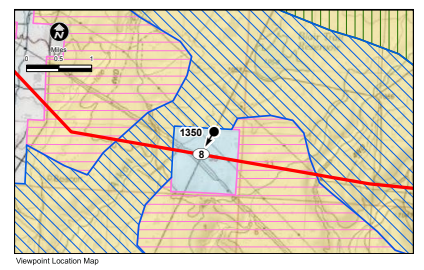
Figure TF-1d





P:\ENV\PLANNING\GIS\Power\2240030\_Gateway\_West\map\layout\skop-1350.mxd Export Date: 07/18/11

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



**Legend**  
 Key Observation Point  
**Transmission Line Routes**  
 Proposed Route  
**Visual Resource Management**  
 Class I  
 Class II  
 Class III  
 Class IV

**Surface Ownership**  
 Bureau of Land Management  
 U.S. Forest Service  
 National Park Service  
 Bureau of Reclamation  
 Department of Defense  
 State  
 Private  
 State Boundary  
 County Boundary

**Photograph Information**

Time of photograph: 10:06 AM

Date of photograph: 8-21-10

Weather condition: Partly Cloudy

Viewing direction: South

Latitude: 43°2'8.80"N

Longitude: 115°20'1.74"W

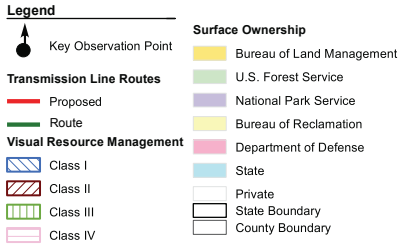
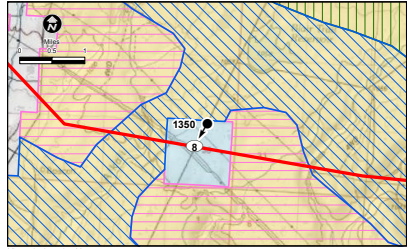
Distance: 0.1 Mile

Existing Conditions  
from Key Observation Point 1350  
Segment 8 Revised Proposed Route

Gateway West  
500kV Transmission Project

Figure J-5a





**Photograph Information**

Time of photograph: 10:06 AM  
 Date of photograph: 8-21-10  
 Weather condition: Partly Cloudy  
 Viewing direction: South  
 Latitude: 43°2'8.80"N  
 Longitude: 115°20'1.74"W  
 Distance: 0.1 Mile

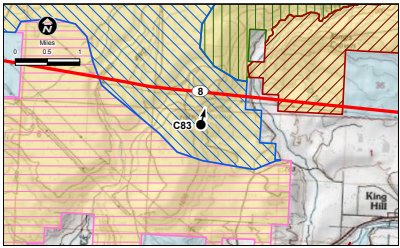
Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



Photographic Simulation  
 from Key Observation Point 1350  
 Segment 8 Revised Proposed Route

Gateway West  
 500kV Transmission Project

Figure J-5b



Legend	
	Key Observation Point
Transmission Line Routes	
	Proposed
	Route
Visual Resource Management	
	Class I
	Class II
	Class III
	Class IV
Surface Ownership	
	Bureau of Land Management
	U.S. Forest Service
	National Park Service
	Bureau of Reclamation
	Department of Defense
	State
	Private
	State Boundary
	County Boundary

**Photograph Information**  
 Time of photograph: 9:00 AM  
 Date of photograph: 12-8-09  
 Weather condition: Partly Cloudy  
 Viewing direction: North  
 Latitude: 42°48'41.47"N  
 Longitude: 105°49'41.72"W  
 Distance: 0.5 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

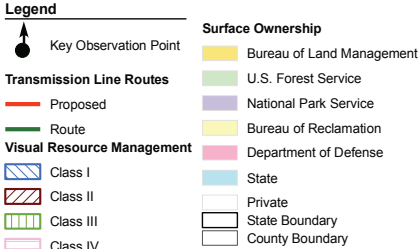
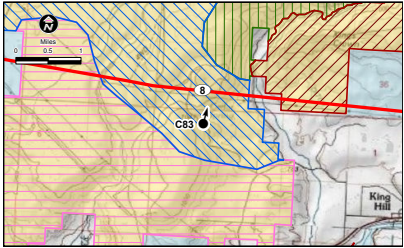


Existing Conditions  
 from Key Observation Point C83  
 Segment 8 Revised Proposed Route

Gateway West  
 500kV Transmission Project

Figure J-5c





**Photograph Information**

Time of photograph: 9:00 AM

Date of photograph: 12-8-09

Weather condition: Partly Cloudy

Viewing direction: North

Latitude: 42°48'41.47"N

Longitude: 105°49'41.72"W

Distance: 0.5 Mile

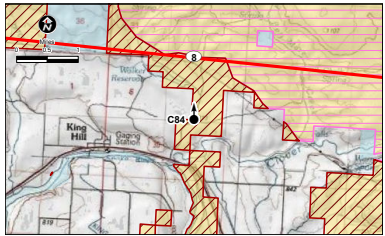
Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



Photographic Simulation  
from Key Observation Point C83  
Segment 8 Revised Proposed Route

Gateway West  
500kV Transmission Project

Figure J-5d



Legend	
	Key Observation Point
Transmission Line Routes	
	Proposed
	Route
Visual Resource Management	
	Class I
	Class II
	Class III
	Class IV
Surface Ownership	
	Bureau of Land Management
	U.S. Forest Service
	National Park Service
	Bureau of Reclamation
	Department of Defense
	State
	Private
	State Boundary
	County Boundary

**Photograph Information**

Time of photograph: 10:38 AM  
 Date of photograph: 11-8-09  
 Weather condition: Partly Cloudy  
 Viewing direction: North  
 Latitude: 43°0'37.67"N  
 Longitude: 115°10'29.43"W  
 Distance: 1 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.

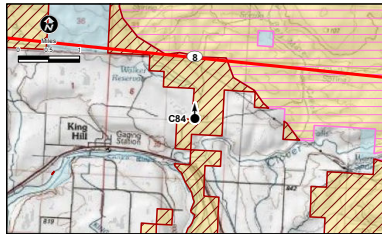


Existing Conditions  
 from Key Observation Point C84  
 Segment 8 Revised Proposed Route

Gateway West  
 500kV Transmission Project

Figure BH-1a





Legend	
Key Observation Point	
Transmission Line Routes	
Proposed	
Route	
Visual Resource Management	
Class I	
Class II	
Class III	
Class IV	
Surface Ownership	
Bureau of Land Management	
U.S. Forest Service	
National Park Service	
Bureau of Reclamation	
Department of Defense	
State	
Private	
State Boundary	
County Boundary	

#### Photograph Information

Time of photograph: 10:38 AM  
 Date of photograph: 11-8-09  
 Weather condition: Partly Cloudy  
 Viewing direction: North  
 Latitude: 43°0'37.67"N  
 Longitude: 115°10'29.43"W  
 Distance: 1 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



Photographic Simulation  
 from Key Observation Point C84  
 Segment 8 Revised Proposed Route

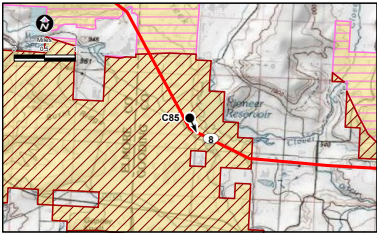
Gateway West  
 500kV Transmission Project

Figure BH-1b





Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



Legend	
	Key Observation Point
Transmission Line Routes	
	Proposed
	Route
Visual Resource Management	
	Class I
	Class II
	Class III
	Class IV
Surface Ownership	
	Bureau of Land Management
	U.S. Forest Service
	National Park Service
	Bureau of Reclamation
	Department of Defense
	State
	Private
	State Boundary
	County Boundary

Photograph Information	
Time of photograph:	11:46 AM
Date of photograph:	8-6-08
Weather condition:	Partly Cloudy
Viewing direction:	Southeast
Latitude:	42°59'9.61"N
Longitude:	115° 4'5.51"W
Distance:	0.1 Mile

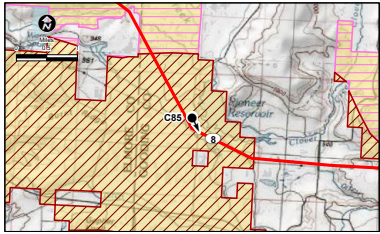
Existing Conditions  
from Key Observation Point C85  
Segment 8 Revised Proposed Route

Gateway West  
500kV Transmission Project

Figure BH-1c



Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



**Legend**

Key Observation Point

**Transmission Line Routes**

- Proposed
- Route

**Visual Resource Management**

- Class I
- Class II
- Class III
- Class IV

**Surface Ownership**

- Bureau of Land Management
- U.S. Forest Service
- National Park Service
- Bureau of Reclamation
- Department of Defense
- State
- Private
- State Boundary
- County Boundary

**Photograph Information**

Time of photograph: 11:46 AM

Date of photograph: 8-6-08

Weather condition: Partly Cloudy

Viewing direction: Southeast

Latitude: 42°59'9.61"N

Longitude: 115° 4'5.51"W

Distance: 0.1 Mile

Photographic Simulation  
from Key Observation Point C85  
Segment 8 Revised Proposed Route

Gateway West  
500kV Transmission Project

Figure BH-1d

## **Attachment B**

### **Key Observation Point Views**

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B-1



**Figure B-1.** Existing Conditions from KOP 1067 in the General Area of the Segment 9 Revised Proposed Route/Route 9K (TF-1 AOI)



B-2



**Figure B-2.** Existing Conditions from KOP C117 looking south toward the Segment 9 Revised Proposed Route (J-3 AOI)



B-3



**Figure B-3.** Existing Conditions from KOP 1156 toward the Segment 9 Revised Proposed Route (BOP-1 AOI)





**Figure B-4.** Existing Conditions from KOP 1155 toward the Segment 9 Revised Proposed Route (BOP-1 AOI)





**Figure B-5.** Existing Conditions from KOP C108 toward the Segment 8 Revised Proposed Route (J-5 AOI)





**Figure B-6.** Existing Conditions from KOP 1209 toward the Segment 8 Revised Proposed Route (J-5 AOI)



B-7



**Figure B-7.** Existing Conditions from KOP 1210 toward the Segment 8 Revised Proposed Route (J-5 AOI)



B-8



**Figure B-8.** Existing Conditions from KOP 1115 toward the Segment 9 Revised Proposed Route (BOP-2 AOI)



B-9



**Figure B-9.** Existing Conditions from KOP C90 toward the Segment 9 Revised Proposed Route (BOP-2 AOI)



B-10



**Figure B-10.** Existing Conditions from KOP 581 toward Routes 9K and 8G near B-1 AOI



B-11



**Figure B-11.** Existing Conditions from KOP 582 toward Routes 9K and 8G (B-1 AOI)

**Appendix H**  
**Resource Advisory Council (RAC) Report**

**Boise District Resource Advisory Council Subcommittee Review and  
Comments on the Gateway West Transmission Line Project  
Mitigation and Enhancement Portfolio for the Morley Nelson Snake  
River Birds of Prey National Conservation Area**

**May 30, 2014**



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## **ATTACHMENTS**

Attachment A.	Comments on the Gateway West Enhancement and Mitigation package from Michael N. Kochert.
Attachment B.	Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014.
Attachment C.	Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA.

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## INTRODUCTION

The Boise District Resource Advisory Council (RAC) advises and makes recommendations to the Bureau of Land Management (BLM) on resource and land management issues in southwestern Idaho. The RAC formed a subcommittee in November 2013 to work on issues surrounding siting the Gateway West Transmission Line Project (GWW) in portions of the Boise District in and around the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA), as well as on private lands. The subcommittee began evaluating the issues related to the GWW, as described in the *Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area* which accompanies this report. The accompanying report summarizes our route option review and recommendations relative to the GWW within and near the BOPNCA.

One task that the subcommittee has undertaken is an evaluation of the Draft Mitigation and Enhancement Portfolio Proposal (Draft Portfolio) prepared by Rocky Mountain Power and Idaho Power Company (hereafter the Companies). The Companies originally submitted the Draft Portfolio to BLM during the comment period for the GWW final environmental impact statement (FEIS) and then revised the document and submitted it to the RAC subcommittee for further evaluation in January 2014. This report presents a summary of the Draft Portfolio and the subcommittee's comments and recommendations for consideration by the RAC, BLM and the Companies in finalizing this important component of GWW.

The Draft Portfolio submitted by the Companies is designed to go above and beyond the standard mitigation requirements (which includes avoidance and minimization through implementation of design features and environmental protection measures/best management practices), which are addressed separately in the permitting process. The Draft Portfolio includes both compensatory mitigation and enhancement components. The compensatory mitigation program addresses the "residual effects" which persist after standard mitigation has been implemented. This additional mitigation is required to return an impacted area to baseline conditions<sup>1</sup>. The enhancement program is designed to go beyond the compensatory mitigation and create a net benefit to the BOPNCA relative to current conditions. The enhancement program has been tailored to the special features of the BOPNCA and the desired future conditions, as determined by the BLM.

The mitigation and enhancement program in the Draft Portfolio should be designed to last the duration of the project permit and monitored throughout:

---

<sup>1</sup> For the purposes of this report, baseline conditions are based on the ecological site potential for a specific area.

The BLM should ensure adequate management, protection, and monitoring of the mitigation during the expected lifetime of the development project and its associated impacts.-Draft MS-1794 – Regional Mitigation Manual Section (P)

[http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/im\\_attachments/2013.Par.57631.File.dat/IM2013-142\\_att1.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2013.Par.57631.File.dat/IM2013-142_att1.pdf)

A mitigation and enhancement plan should be consistent with the enabling legislation for BOPNCA, Public Law 103-64, which established the BOPNCA in 1993 for the following purposes:

The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.

Section 2(4) of the Act defines the term “raptor habitat” to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area.

Section 1((5)(D) states, “Protection of the conservation area as a home for raptors can best and should be accomplished by the Secretary of the Interior, acting through the Bureau of Land Management, under a management plan that: (...) (D) allows for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats and protection and sound management of other resources and values of the area.”

Section 2002 of Public Law 111–11—Mar. 30, 2009, established the National Landscape Conservation System (NLCS) within the BLM and automatically made Snake River Birds of Prey National Conservation Area, among other National Conservation Areas and other special areas, part of the NLCS. Public Law 111-11 specifically mandated the NLCS to uphold the enabling legislation for each of the components of the NLCS. Section 2301 added “Morley Nelson” to the NCA’s title to recognize the contribution of that individual.

Morley Nelson was the first to recognize the significance of what is now the BOPNCA, and his life work was dedicated to demonstrating that raptor protection could be compatible with electrical power transmission and distribution.



The BOPNCA is included in the National Landscape Conservation System, which was created in 2000 with a mission to "conserve, protect, and restore these nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations." This system was formally established by Congress through the Omnibus Public Land Management Act of 2009 and includes 878 federally recognized areas and approximately 27 million acres of National Conservation Areas, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers, National Monuments, National Scenic and Historic Trails, and other special areas. The BLM's National Conservation Lands include 16 NCAs and five similar units in ten states.

To authorize a right-of-way under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that: 1) the use is compatible with the enabling legislation of the BOPNCA (PL 103-64, BLM 2012a); 2) the agency has avoided impacting the BOPNCA to the greatest extent possible (MS 6220); 3) impacts to Greater sage-grouse (BLM 2012b), private property, and local communities, among others, are considered; and 4) an enhancement program will result in a net benefit to the NCA for the duration of the permit (PL 103-64). This report focuses on item 4.

## **HISTORY OF INFORMATION SUBMITTED**

The following is a chronology of information submitted or presented to the subcommittee related to the requirement for a mitigation and enhancement plan for the BOPNCA:

- On December 17, 2013, the Companies gave a presentation on the proposed Draft Portfolio at the RAC subcommittee meeting. The subcommittee held a discussion following the presentation. Comments were later developed by subcommittee members and one member of the public, Michael N. Kochert. The document submitted by Mr. Kochert was titled "Comments on the Gateway West Enhancement and Mitigation package". This document is dated January 5, 2014 and is included as Attachment A.
- On January 13, 2014, the Morley Nelson Snake River Birds of Prey National Conservation Area Gateway West DRAFT Mitigation and Enhancement Portfolio Proposal was transmitted via email to the subcommittee with applicable Environmental Protection Plans (Appendix A) and Cost Estimator tables for BOPNCA Enhancement (Appendix B). The document was prepared by the Companies and dated January 2014.
- On January 16, 2014, the Companies provided an update on the Draft Portfolio to the subcommittee focusing on proposed route Segments 8 and 9 and the components of the plan including habitat restoration, law enforcement, visitor enhancement, land purchase, and existing facility removal. The Draft Portfolio also proposed an oversight committee made up of members with an intimate knowledge of the area. A discussion followed the

update, and comments were provided to the Companies by the subcommittee and the public. These comments are included later in this document.

- On January 28, 2014, the subcommittee provided a brief overview of the Draft Portfolio during the RAC meeting.
- On February 26, 2014, a representative of the Idaho Army National Guard (IDARNG) presented an overview of the Mitigation and Enhancement Program for the Orchard Combat Training Center (OCTC) which is also within the BOPNCA.
- On March 3, 2014, the BLM circulated a list of questions submitted by subcommittee members regarding the Draft Portfolio in preparation for the March 10, 2014 subcommittee meeting.
- On March 10, 2014, the Companies presented an update of the Draft Portfolio and responded to the questions posed by the subcommittee. In addition, a panel discussion was held that included representatives from the BLM, U.S. Geological Survey (USGS), the Audubon Society, and Intermountain Rangeland Consultants regarding the challenges and opportunities in restoring habitat in the BOPNCA. The panel discussion was followed by a presentation by a retired USGS raptor expert on raptor monitoring issues. The Companies also responded to the questions previously circulated by the BLM (see previous item).
- On March 11, 2014, the subcommittee received draft comments from the Golden Eagle Audubon Society in a document titled “Gateway West Mitigation and Enhancement Portfolio – DRAFT Greater Eagle Audubon Society (GEAS) Comments – February 27, 2014”. These comments are included as Attachment B.
- On April 2, 2014, the Companies gave a presentation of a summary of the Draft Portfolio. One objective of the presentation was to provide a distinction between mitigation and enhancement portions of the Draft Portfolio and separately discuss the components of each. The Companies also showed how the funding in the Draft Portfolio could be scaled depending on the routes selected and provided a handout showing how to use the Gateway West Snake River Birds of Prey Enhancement and Mitigation Calculator.
- On April 23, 2014, the Companies provided an estimate of the enhancement funding for the routes recommended by the subcommittee, as well as for all other route options that have been considered by the subcommittee for reference.

## **SUMMARY OF THE COMPONENTS AND THE PROPOSED FUNDING IN THE DRAFT PORTFOLIO**

The Companies first submitted the Draft Portfolio in June 2013 during the FEIS comment period. The Portfolio described “a proposed approach to determine the level of mitigation and enhancement needed to allow for the approval of both Segments 8 and 9.” Proposed funding levels in the Draft Portfolio were based on modified versions of the Companies’ proposed routes in the FEIS. Proposed Segment 8 was modified by Alternatives 8D and 8E, and Proposed Segment 9 was modified by Alternative 9G. These routes are identified in the subcommittee’s report on route options as “Draft Portfolio Proposed Routes.” The anticipated level of disturbance and line mileage within the BOPNCA for the Draft Portfolio Proposed Routes can be considered “a metric that can be applied regardless of the alternative route considered”. In other words, the proposed compensatory mitigation and enhancement for the Draft Portfolio Proposed Routes can be considered a baseline proposal. In the event that different route options are selected by BLM, portions of the compensatory mitigation and enhancement for the BLM selected routes would be determined by a ratio or scaling factor applied to the Draft Portfolio Proposed Routes. In describing the impact of the project on the BOPNCA, the Companies used results of the FEIS analysis, which addressed impacts to cultural resources, plant and wildlife resources (general vegetation, invasive plant species, wetlands, and special status plant species), and raptors and their habitat.

The Draft Portfolio consists of 1) measures and plans for avoidance, minimization, restoration, and compensatory mitigation to offset residual impacts; and 2) elements to enhance the objects and values of the BOPNCA. This review is limited to a review of the components of compensatory mitigation and enhancement. Compensatory mitigation in the Draft Portfolio includes:

- **Habitat Restoration.** Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to reclamation of temporary disturbances. The acreage used in the calculation is scaled by impact and is based on the operational footprint of the project such as a tower footprint and any new permanent access roads. Habitat restoration efforts will be directed towards a return to native vegetation.
- **Law Enforcement.** Funding for part-time law enforcement is proposed to focus on and minimize/eliminate illegal behavior, particularly in response to new permanent access roads.

The Companies indicate that impacts to cultural resources will be mitigated by implementation of the Segment Historic Properties Treatment Plans and a Historic Trails Mitigation Plan. Also, in the event that there would be any impacts to wetlands or riparian areas, those impacts would be offset and mitigated by the implementation of the wetland mitigation plan titled

“Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the United States”. Table 1 provides the estimated cost of the compensatory mitigation components in the Draft Portfolio.

**Table 1. Estimated Cost of Compensatory Mitigation.**

<b>Element</b>	<b>Habitat Restoration</b>	<b>Law Enforcement</b> ¼ FTE for 10 years	<b>Total</b>
<b>Compensatory Mitigation</b>	\$266,400	\$350,000	\$616,400

Enhancement in the Draft Portfolio includes:

- Habitat Restoration.** Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to compensatory mitigation and the reclamation of temporary disturbances. The acreage used in the calculation is based on the construction footprint of the project, which is larger than the operational footprint. The funding is scalable depending on the number of acres and the quality of land affected by the project. High quality lands, such as undisturbed habitat, would be mitigated with a higher number of acres, while lower quality land, such as land occupied by invasive species, would be mitigated with a lower number of acres. Habitat restoration would be aggressive and concentrated with the intent of a high success rate for each acre restored. Habitat restoration efforts will be directed towards a return to perennial vegetation.
- Land Purchase.** Funding for land purchase is proposed by the Companies to protect cultural resources and habitat. The Companies would provide funding to be used for the purchase of property(ies) with unique cultural, visual, and/or ecological values to further protect those resources from future damage. Properties would be purchased from willing sellers within the BOPNCA boundaries, and the amount of money offered for property purchase would be scaled using the miles of the BOPNCA crossed by the proposed route.
- Law Enforcement.** Funding for law enforcement is proposed by the Companies to reduce inappropriate behavior within the BOPNCA. The Draft Portfolio provides for a BLM ranger to offset potential unlawful activity that may be associated with the increased access created by new rights-of-way and maintenance roads. The funding is scaled by line miles of the routes within the BOPNCA and would last for an initial 10-year period followed by an additional 10 years but with funding for fewer hours per week.



- **Visitor Enhancement.** Funding for visitor enhancement is proposed by the Companies to educate visitors of the values of BOPNCA and in the appropriate behavior within and use of the BOPNCA. This funding is also scaled by line miles of the routes within the BOPNCA.
- **Management Fund.** A management fund is proposed by the Companies to cover the costs of the oversight committee, administration, and monitoring. The management fund, regardless of routes ultimately approved by the BLM, is a fixed amount equal to the amount currently proposed. The oversight committee would be made up of people with knowledge of the BOPNCA and surrounding area.
- **Idaho Power Existing Facility Removal.** The Companies propose to remove portions of two existing lower-voltage power lines and one substation owned by Idaho Power from areas within the BOPNCA to further enhance the BOPNCA. The BLM could elect to leave some of the power poles from the removed lines as perching and nesting opportunities for birds of prey. The Companies still have customers to serve in these areas and have included in the removal of the lower-voltage power lines the additional infrastructure required (which is outside the BOPNCA) to continue service to these customers.

Table 2 provides the estimated cost of the enhancement components based on the Draft Portfolio Proposed Routes. The total cost of compensatory mitigation and enhancement is shown on Table 3.

**Table 2. Estimated Cost of the Enhancement Components of the Draft Portfolio.**

Element	Habitat Restoration	Law Enforcement <small>¾ FTE for 10 years, ½ FTE for an additional 10 years</small>	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
Enhancement	\$3,297,600	\$1,750,000	\$320,000	\$500,000	\$1,922,000 (cost to Companies)	\$1,000,000	\$6,867,600 (excluding line removal costs)

**Table 3. The Estimated Total Cost of Proposed Compensatory Mitigation and Enhancement Components.**

Element	Habitat Restoration	Law Enforcement ¾ FTE for 10 years, ½ FTE for an additional 10 years	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
<b>Mitigation</b>	\$266,400	\$350,000	--	--	--	--	\$616,400
<b>Enhancement</b>	\$3,297,600	\$1,750,000	\$320,000	\$500,000	\$1,922,000 (cost to Companies)	\$1,000,000	\$6,867,600 (excluding line removal costs)
<b>TOTALS</b>	\$3,564,000	\$2,100,000	\$320,000	\$500,000	\$1,922,000 (cost to Companies)	\$1,000,000	\$7,484,000 (excluding line removal costs)

The total cost of the Draft Portfolio based on the Companies proposed routes, including costs incurred by the Companies to remove Idaho Power facilities is \$9,406,000.

During the April 18, 2014 meeting, the subcommittee completed the identification and categorization of alternative routes for Segments 8 and 9 in and around the BOPNCA. The subcommittee classified route options as either recommended or not recommended. The subcommittee then requested that the Companies provide an estimated enhancement funding value for the recommended routes. The Companies provided the estimated enhancement funding for all subcommittee route options (routes ranked recommended and not recommended), and the values and other information are provided in Table 4.

In addition to Table 4, the Companies also provided the following summary information and example calculation of the estimated enhancement funding values using the subcommittee recommended routes:

- Companies' Draft Portfolio Proposed routes
  - Segment 8 with 8D and 8E – 36.6 miles
  - Segment 9 with 9G – 52.3 miles
- Subcommittee recommended alternative routes – miles on BLM within the BOPNCA
  - Segment 8, Summer Lake Option 1 revised – 15.4 miles
  - Segment 9, Baja Road-Murphy Flat South revised – 46.1 miles
- Percentage of subcommittee recommended alternative line miles to Companies' Proposed routes
  - Segment 8, Summer Lake Option 1 revised –  $15.4/36.6 = 42.08\%$
  - Segment 9, Baja Road-Murphy Flat South revised –  $46.1/52.3 = 88.15\%$

- Estimated enhancement funding value of subcommittee recommended route options based on Companies' proposed enhancement funding amount for habitat restoration, land purchase, law enforcement, and visitor enhancement for each segment
  - Segment 8, Summer Lake Option 1 revised –  $\$2,527,765 \times 42.08\% = \$1,063,684$
  - Segment 9, Baja Road-Murphy Flat South revised –  $\$3,339,835 \times 88.15\% = \$2,944,065$
- Total estimated enhancement funding value for subcommittee recommended route options
  - $\$1,063,593 + \$2,943,908 + \$1,000,000$  (management fund) = **\$5,007,501**
- Total value of estimated enhancement for subcommittee recommended route options
  - $\$5,007,503 + \$1,922,000$  (Idaho Power facility removal) = **\$6,929,503**

**Table 4. Subcommittee Route Options Estimated Enhancement Funding.**

Route	BLM*	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
<b>Segment 8</b>				
Draft Portfolio Proposed Route 8	36.6	Not recommended	100%	\$2,527,765
Applicant Proposed (FEIS)	25.4	Not recommended	69.40%	\$1,754,241
Bowmont North	4.8	Not recommended	13.11%	\$331,510
Bowmont South	12.1	Not recommended	33.06%	\$835,682
Bowmont South - 500kV Rebuild	0.7	Not recommended	1.91%	\$48,345
King Hill-Mayfield	1.7	Not recommended	4.64%	\$117,410
Melmont Option 1	9.3	Not recommended	25.41%	\$642,301
Melmont Option 2	9.4	Not recommended	25.68%	\$649,207
OCTC Alpha Sector By-pass Variation (FEIS Alt 8D)	2.9	Not recommended	7.92%	\$200,287
Sinker Butte (FEIS Alt 8E)	38.6	Not recommended	105.46%	\$2,665,894
Summer Lake (Option 2)	18.8	Not recommended	51.37%	\$1,298,415
Summer Lake Option 1	15.4	Recommended	42.08%	\$1,063,595
<b>Segment 9</b>				
Draft Portfolio Proposed Route 9	52.3	Not recommended	100%	\$3,339,835
Applicant Proposed (WVEC Alternative - FEIS)	4.8	Not recommended	9.18%	\$306,524
Baja Road-Murphy Flat North Option 1	48.7	Not recommended	93.12%	\$3,109,942
Baja Road-Murphy Flat North Option 2	47.1	Not recommended	90.06%	\$3,007,767
Baja Road-Murphy Flat North Option 3	48.7	Not recommended	93.12%	\$3,109,942



**Table 4. Subcommittee Route Options Estimated Enhancement Funding.**

Route	BLM*	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
Baja Road-Murphy Flat S.	46.1	Recommended	88.15%	\$2,943,908
Baja Road-Sinker Creek	43.7	Not recommended	83.56%	\$2,790,646
Baja Road-Summer Lake	46.7	Not recommended	89.29%	\$2,982,223
Bruneau South Variation (FEIS Alt 9H)	1.4	Not recommended	2.68%	\$89,403
Cove Variation (FEIS Alt 9D)	5.8	Not recommended	11.09%	\$370,383
Glenn's Ferry-Mayfield	2	Not recommended	3.82%	\$127,718
Owyhee Uplands (DEIS Alt 9E)	2.7	Not recommended	5.16%	\$172,420
Owyhee Uplands (FEIS Alt 9E)	5	Not recommended	9.56%	\$319,296
Sinker Creek Variation	0.2	Not recommended	0.38%	\$12,772

\*\* Miles of transmission line on BLM managed land within the BOPNCA.

\*\* Includes funding for habitat restoration, land purchase, law enforcement, and visitor enhancement. Does not include management funding (\$1M) and does not include cost to Companies for facility removal (\$1.922M).

## **RAC SUBCOMMITTEE AND PUBLIC COMMENTS AND RECOMMENDATIONS ON THE DRAFT PORTFOLIO**

### **General Comments**

The subcommittee commends the Companies for including several components that address important BOPNCA values in their Draft Portfolio. We agree with the apparent long-term commitment implied by the financial support designated for law enforcement, the management oversight group, and cultural resources protection. Although we may disagree with the dollar amounts proposed in both real and relative terms, we agree that a long-term commitment is necessary to mitigate the direct impacts of the GWW project through the BOPNCA and to enhance the area for future generations.

The subcommittee also commends the Companies for their continued involvement and cooperative interaction during the course of the 6-month process of the subcommittee meetings and deliberations. We have learned from the Companies and sincerely appreciate their cooperation and adaptability during the process.

The BOPNCA was established to protect raptor populations and habitats and the natural, environmental, scientific, cultural and educational resources found within the conservation area. The enhancement package applies to these resources. In addition, the enhancement package must take into account the current resources available to protect the NCA. Native vegetation in the NCA has suffered greatly due to fires, off-road vehicle use and a lack of restoration resources. On the other hand, there are dozens of groups in the Boise area conducting outings and tours to educate the public about the NCA. The enhancement package should focus on the resources within the NCA that are most in need of enhancement- raptor populations, habitats and the natural environment. This includes restoring native habitat, closing and monitoring roads that fragment the landscape, and decreasing the destructive impacts of fires.

Lastly, while the subcommittee thanks the Companies for their expertise during this process, we cannot endorse the enhancement package as presented. The Companies' enhancement package proposes a myriad of various projects without demonstrating how standards of enhancement will be met during the life of the project. We encourage the BLM to take a hard look at the true cost of enhancement. The enhancement package should not be punitive, but must meet the high standards outlined in the NCA legislation.

The Subcommittee did not reach a conclusion on the funding levels contained in the Draft Portfolio. However, the general consensus of the subcommittee is that the proposed funding levels are too low. As BLM moves forward with any additional NEPA reviews the Subcommittee recommends that BLM explore how successful mitigation and enhancement packages have been developed in other areas of the country. Settling upon a dollar amount for mitigation and enhancement will entail numerous negotiation sessions between the Companies

and BLM. Hopefully, it will include some background assessments of the environmental, social and economic benefits and costs of lines crossing the BOPNCA. We encourage the BLM and the Companies to derive a valid economic assessment of the benefits and costs of the actions specific to the BOPNCA for the NEPA process.

The subcommittee found that the Draft Portfolio did not adequately address enhancement of raptor populations and scientific resources and values, and we recommend that it be expanded to include components to enhance these two important values recognized by the enabling legislation. In addition, we recommend that Law Enforcement and Visitor Enhancement be combined into one category, called Visitor Management which would also include Education. There should be separate categories for Enhancement of Raptor Populations and Research and Monitoring. The subcommittee recommends that the BLM and the Companies re-evaluate priorities and revise the proposed allocations among these components.

To be consistent with the enabling legislation, the RAC subcommittee recommends that the Draft Portfolio should seek to conserve, protect, and enhance these specific resource issues:

- Raptor populations;
- Raptor habitats (raptor habitat includes the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the BOPNCA);
- Natural and environmental resources and values associated with the BOPNCA;
- Scientific resources and values of the public lands in the BOPNCA;
- Cultural resources and values of the public lands in the BOPNCA; and
- Educational resources and values of the public lands in the BOPNCA.

We believe that the Draft Portfolio should be designed and implemented with the following considerations:

- Be consistent with the BOPNCA Enabling Legislation and highlight the relevant features, particularly raptors, their prey and the supporting habitat;
- Be diverse: contain a diverse portfolio of enhancement options, some of which the Draft Portfolio contains;
- Be durable: the functional time span of each component of the Draft Portfolio needs to be discussed, and the benefits need to last for as long as the impacts of the transmission line are expected to be present;
- Accurately assess the probability of restoration success: the measure of success should not be the number of attempts at restoration, but achieved restoration to a set of pre-agreed upon criteria;
- Protect high-quality habitat and restoration areas: successful restoration efforts need to be protected; and

- Be reasonable (both locally and nationally): the enhancement opportunities provided by the Draft Portfolio should not relieve the BLM of their responsibility to provide funding to manage the BOPNCA. That said, the enhancement components of the Draft Portfolio should be substantive.

## **SPECIFIC COMMENTS AND RECOMMENDATIONS**

### **Habitat Restoration**

The subcommittee believes that the Draft Portfolio should contain an integrated and adaptive approach with a long-term focus for habitat restoration in the BOPNCA using current scientific research and information as presented to the subcommittee on March 10, 2014 by representatives from the BLM, USGS, the Audubon Society, and Intermountain Rangeland Consultants. We believe that innovative methods for rangeland restoration should be evaluated and pursued within the BOPNCA that could eventually be used broadly to help manage lands outside the BOPNCA.

As we have discussed during the deliberations of the subcommittee, the concept of “baseline” conditions needs careful consideration and a clearer definition. Efforts at restoration and rehabilitation should be undertaken with the awareness that the BOPNCA includes some of the harshest environments in the Great Basin. The BOPNCA is in an environment that experiences extremely low precipitation, high summer temperatures, and invasion of habitat-altering annual grasses, all of which increases fire frequency. It will be extremely difficult to accomplish the restoration goals of the BLM and Companies without strategic planning and implementation that may include repeated efforts to establish vegetation in this harsh environment. We recommend that areas proposed for habitat restoration and enhancement be defined in detail via maps. However, we have concerns that small-scale, intensive and very expensive rehabilitation efforts will ultimately fail due to repeated fires, lack of maintenance, and other factors. We would prefer seeing larger, strategic areas treated than the small microcosms described in the Draft Portfolio.

We recommend that the portfolio’s emphasis on small microcosms be reduced and combined with a landscape-scale strategy for habitat protection, restoration, and enhancement. Key remnant native sagebrush (*Artemisia*) patches within the BOPNCA that exhibit ecological integrity and are still “intact” should be identified, and preserving their integrity should be a priority. The subcommittee recommends that remnant stands of sagebrush and other perennial vegetation such as winterfat (*Krascheninnikovia lanata*) be protected using strategically placed firebreaks and other tools. Firebreaks may later be modified to protect newly restored and connected patches to help ensure protection from future fires. Successful protection of remaining habitat and restoration investments will require decreasing the response time of fire suppression efforts and increasing the response capability. These goals could be accomplished through a variety of partnerships and cooperative programs, including, but not limited to, the following:



- Providing additional fire-fighting resources (equipment, training, staff and funding, etc.);
- Updating cooperative agreements and coordinated response programs with rural fire departments, municipal Fire Departments, and Rangeland Fire Protection Associations to reduce the response time; and
- Updating the Idaho Fire Prevention Plan<sup>2</sup> to better protect native vegetation within the BOPNCA by preventing human-caused wildfires.

### **Enhancement of Raptor Populations**

The first step in maintaining and enhancing raptor populations is to ensure that the new transmission lines have no adverse effects on raptors. Ultimately, enhancement measures should improve or at least maintain current raptor population levels. The permitting process should disallow line construction within the BOPNCA during the nesting season (February-August) to avoid direct disturbance to nesting raptors. Biologists and engineers should work together to design towers that are friendly to raptors but not to ravens. For example, the density of steel latticework on the bridge above the conductors should be as low as possible to discourage raven nesting. Towers with tubular metal poles may not benefit raptors because of vibrations and the lack of suitable perching and nesting sites.

The Draft Portfolio should include funding for construction of artificial platforms on transmission towers within the BOPNCA that will provide nesting sites at a safe location below the conductors. New towers in areas that replace or parallel existing lines should be designed in a way to encourage continued nesting by raptors, particularly ferruginous hawks (*Buteo regalis*), which are currently nesting on existing transmission towers. Where existing lines are planned for removal, structures that are suitable for raptor nests and perches should be left intact. Artificial nesting platforms can provide new and alternative nesting substrate for raptors, particularly ferruginous hawks and golden eagles (*Aquila chrysaetos*), in areas without cliffs or existing transmission lines (e.g., Murphy Flat). Providing opportunities for nesting on taller structures might benefit eagles on the Owyhee Front by reducing their exposure to disturbance from off highway vehicles.

Enhancing raptor populations requires enhancing prey populations, and prey populations are best enhanced by managing their habitat. The two principal prey species within the BOPNCA are the Piute ground squirrel (*Urocitellus mollis*) and the black-tailed jack rabbit (*Lepus californicus*). Ground squirrels are the primary prey of prairie falcons (*Falco mexicanus*), the raptor species for which the BOPNCA was first recognized and created. Jack rabbits are the primary prey of golden eagles. Jackrabbits require shrubs for food and cover; ground squirrels thrive best in vegetation communities dominated by native perennial shrubs and grasses.

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<sup>2</sup>[http://www.blm.gov/pgdata/etc/medialib/blm/id/fire/fire\\_restriction\\_maps.Par.70675.File.dat/2013\\_IdahoFireRestrictionsPlan\\_508.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/id/fire/fire_restriction_maps.Par.70675.File.dat/2013_IdahoFireRestrictionsPlan_508.pdf)

Restoring habitat and increasing prey populations will benefit raptors, but additional measures to enhance raptor populations directly should be included in population enhancement strategies. We recommend that a proactive and accelerated program for retrofitting distribution lines within the BOPNCA be undertaken to reduce the potential for electrocution of raptors. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following guidelines described in the Avian Power Line Interaction Committee's publication "Suggested Practices for Avian Protection On Power Lines: The State of the Art in 2006" (APLIC 2006). More frequent patrols should be conducted to determine if poles being used by raptors are raptor-safe.

### **Research and Monitoring**

The subcommittee recommends that the Companies provide funding for research and monitoring in the BOPNCA. We recommend that effective monitoring be proposed at all trophic levels. Habitat restoration should be monitored in conjunction with trends in prey and raptor populations. Monitoring should focus on the effects of the new transmission lines and associated mitigation and enhancement efforts, but to be effective, it must consider resources throughout the BOPNCA.

We believe that the Draft Portfolio should specify a vegetation monitoring plan for native shrubs, grasses, and forbs that will allow an evaluation of the effectiveness of habitat restoration and an understanding of success rates. The monitoring information will be the basis for adapting the restoration approach to challenges and failures so that long-term success can be achieved. The results and findings should be considered as a model for other sites across the West where sagebrush recovery and restoration are needed.

We recommend that monitoring protocols be put in place to understand the effects of transmission lines and raptor response to nest and perch enhancement and identify any negative impacts of power line construction. Use of the new transmission lines by raptors and ravens should be monitored as it was along the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993).

Monitoring trends in raptors nesting on transmission lines must be carried out in conjunction with monitoring population trends throughout the BOPNCA. The Ferruginous Hawk should be a priority for monitoring because it is the species most likely to respond to transmission lines within the BOPNCA Priorities and approaches for monitoring raptors throughout the BOPNCA should follow recommendations from the Raptor Monitoring Workshop held in June 2008 (Attachment C). Golden Eagles and Prairie Falcons should be a high priority for monitoring because these species were cornerstones in establishing the BOPNCA and because a large set of background data has been collected on them. The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and the jackrabbit's status is associated with shrub habitat. The Prairie Falcon is a ground squirrel specialist and is sensitive to changes in ground

squirrel abundance as a result of climate change and habitat alteration. Prairie Falcon nesting populations in the canyon have not been assessed since 2003. Future studies should be designed to assess whether these three important species are or are not adapting to habitat changes that have occurred. Species that respond favorably to shrub loss (e.g., northern harriers [*Circus cyaneus*], short-eared owls [*Asio flammeus*] or agricultural development (e.g., Swainson's hawks [*Buteo swainsoni*], red-tailed hawks [*Buteo jamaicensis*], American kestrels [*Falco sparverius*]) should be a lower priority for research and monitoring.

We recommend that the Draft Portfolio also provide for monitoring trends in small mammal populations that are key prey species (ground squirrels and jack rabbits) on a landscape level throughout the BOPNCA. The monitoring of small mammals should be coordinated with raptor monitoring.

New and improved access roads associated with transmission line construction and operation could increase recreational shooting near the lines. There is a concern that elevated soil concentrations of lead from shooting and trash and litter accumulation could have long term impacts on prey and raptor populations. The Companies should propose studies that evaluate the extent of lead in the environment in the BOPNCA and examine potential solutions. There also may be a need to examine the effects of recreational shooting on raptor and prey populations.

Proposed research and monitoring should recognize and take advantage of previous work undertaken within the BOPNCA. This component should include the resources necessary to perform an integrated and adaptive approach. We view the oversight committee as being critical in helping to define both integrated research objectives and monitoring needs of the area. Biologists from several agencies and universities are currently conducting research projects within the BOPNCA. We recommend that the oversight committee be proactive in focusing, prioritizing, and integrating these and future research efforts to ensure that they address BLM's long-term and short-term needs in a coordinated way. The Companies should consider funding a repository for archiving and disseminating data collected in the BOPNCA to be used by both researchers and managers. The NCA Research Group recently identified a need to compile available data from previous studies and monitoring efforts, and to make these data available and accessible. We recommend formalizing and expanding the research and monitoring program to maximize the benefits and leverage additional funding opportunities. One possibility would be to create an endowment (see below) to fund research and monitoring into the future.

### **Visitor Management**

We are pleased that the Draft Portfolio includes funding for enhanced BLM law enforcement patrols. This funding should continue for the duration of the permit. An expanded on-site presence will reduce degradation caused by irresponsible public recreational use. Partnering with local communities and civic groups could expand opportunities for visitor contact within the

BOPNCA. Again, the oversight committee can provide guidance about this important component of the Draft Portfolio.

The BLM already has an excellent public education program for the BOPNCA. It employs a full time Environmental Education Specialist, dedicated to the BOPNCA. This specialist gives more than 100 presentations at schools and special events each year and contacts more than 8,000 individuals. The BLM has a sign management plan for the BOPNCA, maintains a website about the BOPNCA, and has developed a visitor's guide that contains general maps of the BOPNCA, raptor viewing information, and recreational opportunities. Public education about NCA raptors and their habitat also occurs at the Peregrine Fund's World Center for Birds of Prey, the Idaho Fish and Game's MK Nature Center, Canyon County's Celebration Park visitor center, and the Kuna Chamber of Commerce visitor facility. The Snake River Raptor Volunteer group is also involved in public education. The subcommittee finds that public education is currently closer to meeting objectives than other programs.

### **Land Purchase**

The Companies' recommendation for property purchase was based on enhancing the preservation of cultural resources. We recommend re-evaluating whether land purchase should be a priority or whether it would be best to invest funds in an endowment (see below) to enhance all resources and values over a longer time frame. If land purchase is a component of the enhancement package, some degree of funding should be included to help manage these lands.

### **Fund Management**

The Subcommittee believes that BLM should explore establishing a fund located with a third party, such as an Idaho state agency, to receive and manage enhancement funds on behalf of the BLM. The state agency would distribute funds at the direction of BLM with the advice of the Implementation and Oversight Committee.

### **Implementation and Oversight Committee**

The Companies have suggested creating and funding an oversight committee to make recommendations to the BLM on the implementation of the enhancement program. We recommend that the oversight committee include interested and involved people with local expertise on each of the trophic levels (plants, prey, and raptors). The structure, responsibilities and management of the oversight committee have yet to be determined. One option is for the oversight committee to be a subcommittee of the Boise District RAC. However, we view the oversight committee as being critical to the long-term sustainability of the BOPNCA and the Companies' success with implementation of the Draft Portfolio. We recommend that the BLM establish the oversight committee as soon as feasible and seek their involvement in the immediate and long-term decisions needed to sustain the integrity of the BOPNCA.



## **Duration of the Enhancement Components**

The BLM should ensure that adequate funding is provided for enhancement components during the period for which the right-of-way permit is granted. Contingencies for responding to fires that may impact restoration areas should be included in the permit. The relevant issues should be revisited to determine if the goals of enhancement have been met when the permit is renewed.

## **Allocation Prioritization**

We respectfully attempt to categorize and prioritize the efforts and funding implied in the Draft Portfolio. We recommend that the BLM consider the enhancement components in the following order of priority:

- Enhancement of Raptor Populations
- Habitat Restoration
- Research and Monitoring
- Implementation and Oversight Committee
- Visitor Management
- Land Purchase

We believe it is important that the BLM ensure adequate funding for all enhancement components. It is especially important for the first four categories listed above.

## **REFERENCES**

- Avian Power Line Interaction Committee (APLIC). 2006. *Suggested practices for raptor protection on power lines; the state of the art in 2006*. Edison Electric Institute; Raptor Research Foundation, Washington, D.C. USA.
- Bureau of Land Management. (2012a). *Instructional memorandum no. 2012-043, Greater Sage-Grouse Interim Management Policies and Procedures*. Issued by the Director of the Bureau of Land Management. Washington, D.C. February 2012.
- Bureau of Land Management (BLM). (2012b). *BLM Manual 6220- National Monuments, National Conservation Areas, and Similar Designations*. Release Number 6-132. July 13, 2012.
- PL 103-64. Snake River Birds of Prey National Conservation Area. (PL 103-64, August 4, 2013).
- Steenhof, K., M.N. Kochert, L.B. Carpenter, and J.A. Roppe. 1993. *Nesting by raptors and common ravens on electrical transmission line towers*. J. Wildl. Manage. 57(2):271-281.

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## **ATTACHMENT A**

**Comments on the Gateway West Enhancement and  
Mitigation package from Michael N. Kochert**





01/05/2014

To: Gateway West Subcommittee co-chairs

Fr: Michael N. Kochert

Re: **Comments on the Gateway West Enhancement and Mitigation package.**

Thank you for the opportunity to attend your 17 December 2013 meeting on the Gateway West transmission line and to hear the presentation describing the Enhancement and Mitigation plan for the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). This message is a follow-up to my oral comments at the meeting.

As a matter of introduction, I have conducted and directed research and monitoring of raptors, prey, and vegetation in the NCA for nearly 45 years. I also studied colonization and use of the 500 kV PP&L (PacifiCorp) transmission line by raptors and ravens with agency and industry colleagues for 10 of those years.

My comments are as follows:

1. I commend Idaho Power and Rocky Mountain Power for the comprehensive package, and I commend the BLM Boise District and NCA staffs for their input to the effort.
2. The NCA was established by the U.S. Congress because the area contains an internationally unique aggregation of nesting raptors, and the legislation calls for protection and enhancement of the unique raptor nesting populations. Given that, most of my comments are predicated on the premise that major actions in the NCA need to consider the ultimate effect on the unique raptor resource.
3. Although the Enhancement and Mitigation package is quite comprehensive, a major deficiency of the package is that it lacks a monitoring component. Given that the package identifies a fairly substantial investment for many enhancement and mitigation actions, it is very important to evaluate the effectiveness of those actions. For example, I sensed at the meeting that there was not complete agreement on the predicted success rate of the habitat restoration efforts. As I stated at the meeting, I commend the parties involved for proposing to undertake such a challenging effort. However, given the extremely dry climate in the NCA in the recent past and predicted for the future, success of restoration efforts in the low precipitation zone in the Grand View and Bruneau areas could be extremely low. Even in decent precipitation years vegetation restoration in these areas could be a challenge. Given the uncertainty, I believe that restoration efforts should be monitored for effectiveness.

I suggest that the Enhancement and Mitigation package provide for development of a comprehensive, peer reviewed monitoring plan. The monitoring efforts, if designed

properly, would provide the opportunity to for adaptive management experiments. The plan should identify the metrics for success. For example, will restoration success be a measure of vegetation in the restored areas or will it be prey composition and density, or reproductive performance of the nesting raptors?

4. Because construction of the transmission lines and the major proposed enhancement actions has the potential to ultimately affect the raptor populations, I believe it is incumbent to monitor the status of the major raptors in the area. I believe that colonization of the transmission line should be monitored much like it was done with establishment of the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993). The monitoring of the PP&L line provided valuable information to the utility, and it also identified the effect of the line on the raptor and raven population.

It seems to me that the goal of the large-scale restoration efforts is to enhance the habitat and ultimately enhance or maintain the raptors. In my opinion, evaluating the effectiveness of large-scale restoration efforts without assessing raptor populations is falling short of completely evaluating the effectiveness of restoration efforts. A well-designed monitoring effort at the three main trophic levels would serve as a good adaptive management experiment for the restoration efforts.

5. I noticed that the Enhancement and Mitigation package did not mention or address raptors. I believe that that installation of nesting platforms can be an important enhancement and management effort. We found from our long-term research on the PP&L transmission line that the nesting platforms enhanced raptor nesting success (Steenhof et al. 1993). We also found that, when placed properly, nesting platforms can attract raptors to nest below the conductors. For example, in all cases where Golden Eagles nested in towers with nesting platforms below the conductors, eagles nested in the platforms and in no other position of the tower. When planning for the 500-kV transmission line in the late 1970s, the PP&L (PacifiCorp) sought Morley Nelson's advice about placement of nesting platforms to enhance raptor nesting opportunities on the transmission line. During my work on the PP&L transmission line project I observed that PP&L personnel readily climbed to the nesting platforms located just above the waist below the conductors and performed work in the nest without the need to shut down the transmission line.
6. I have no problems with the proposal to removal of 8 miles of existing 46-kV transmission line between Bowmont and Gage substations. However, I suggest that IPC leave the existing poles and cross arms to reduce the cost of removal and to provide nesting and perching opportunities for raptors.

7. Several miles of 3-phase, cross arm distribution and transmission lines exist in the NCA, and electrocution of raptors has been reported on these power lines (Lehman and Barrett 2002). In my opinion, a positive enhancement effort would be to patrol untreated distribution and transmission lines for dead raptors and to retrofit any pole where an electrocution has occurred. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following procedures described in APLIC (2006).

#### Literature Cited

- Avian Power Line Interaction Committee (APLIC). 2006. Suggested practices for raptor protection on power lines; The state of the art in 2006. Edison Electric Institute; Raptor Research Foundation, Washington, D.C. USA.
- Lehman, R. N., and J. S. Barrett. 2002. Raptor electrocutions and associated fire hazards in the Snake River Birds of Prey National Conservation Area. Idaho Bureau of Land Management Technical.

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## **ATTACHMENT B**

### **Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014**





**Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments –  
February 27, 2014**

To: Bureau of Land Management Resource Advisory Committee Gateway West  
Subcommittee Co-Chairs

From: Golden Eagle Audubon Society

Re: Comments on the Gateway West Enhancement and Mitigation Portfolio, 1/10/2014

Thank you for this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We, the Board of Directors, write these comments on behalf of members of Golden Eagle Audubon Society (GEAS). GEAS constitutes some 1,500 members primarily residing in southwest Idaho. Our strategic focus is the conservation of birds, wildlife, and their habitats and promotion of wildlife appreciation by SW Idaho residents. Regarding the Gateway West Enhancement and Mitigation Portfolio, our primary concerns include the potentially highly inaccurate success estimate for restoration of native plant communities; the potential missed opportunities to enhance raptor nesting, perching and foraging opportunities; and the lack of a reliable monitoring strategy to track the value of proposed (and needed) enhancement and mitigation actions. GEAS would like to see the outcomes of this Enhancement and Mitigation Portfolio positively affect plants and wildlife, more specifically birds and bird habitat. The majority of our members live and bird watch in southwest Idaho and the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) is very dear to our membership. We propose actions that can lead directly to an overall enhancement of SRBOP for the betterment of raptors, other birds, other wildlife and their habitats, and to better enjoyment for the wildlife-loving public.

**General Comments:**

GEAS applauds Rocky Mountain Power and Idaho Power's (hereafter, 'the Companies') effort to work "in spirit of cooperation" to "meet enhancement requirements" (page 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, page 35).

The Portfolio indicates that the Enabling Legislation for SRBOP, Public Law 103-64, established the SRBOP in 1993 for the "...conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values...." Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area. Furthermore, it references the 2008 SRBOP Resource Management Plan (RMP) indicating: "the SRBOP is managed by BLM under the concept of dominant use rather than multiple use. This means that prior to authorizing uses,

BLM determines the compatibility of those uses with the purposes for which the NCA was established.”

Based on the Public Law and the RMP, the Portfolio states (Page 33, Sect. 8.2) that, “locating utilities within these (designated) corridors is consistent with the RMP and with the enabling legislation for the SRBOP and therefore should require no additional enhancement to be consistent with the enabling legislation.” GEAS does not agree with this position. Degradation to raptor habitat as a result of powerline construction is not consistent with enabling legislation. Enhancement therefore is a required act to mitigate for reduction and damage to raptor habitat, not simply an in-kind act “in the spirit of cooperation”. Further, it is the Companies responsibility as a direct economic beneficiary of the line installation to ensure – for the long-term – that raptor habitat is not degraded as a result of the powerline. The Portfolio correctly cites the SRBOP RMP stating, “to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded (page 36)”. Thus, to meet RMP objectives as well as operate in the spirit of cooperation, the Companies should be seeking to expand and inter-connect native vegetation in order to achieve objectives stated in the RMP.

GEAS contends that the Companies are in a positive economic situation right now as they have saved significant expenses by routing Sections 8 and 9 through SRBOP – a decision GEAS vocally supported with comments submitted during the Final Environment Impact Statement comment period. The Companies saved substantial dollars by using SRBOP because the route covers fewer miles, there is less need to compensate private landowners, and there are minimal new road construction costs. Funding the restoration approach we propose is not out of the realm for the Companies and is in the Companies best interests to demonstrate their social responsibility and sustainability highlighted in their business plans and reports.

### **Specific Comments and Recommendations**

The most critical component to long-term stability of the world-renowned raptor populations of SRBOP is maintenance and enhancement of native vegetation communities that support diverse, abundant prey bases for the raptors. Therefore, GEAS provides comments that can lead to the direct actions necessary to achieve habitat restoration and enhancement goals.

GEAS proposes the use of an integrated and adaptive approach where restoration is applied. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseedling and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers

(2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understood before implementing a restoration plan in the SRBOP.

Cheatgrass presence complicates these efforts. The invasion of cheatgrass has changed the fire frequency in sagebrush systems such as the SRBOP where, prior to cheatgrass invasions, fire occurred on average every 70 years. Cheatgrass presence has accelerated fire return intervals to 5 to 7 years, a drastic change that has completely altered habitat in the SRBOP and makes remnant stands of native vegetation a vital element of the long-term health of SRBOP and its ability to support raptors. Thus it is critical to first protect remnant sagebrush patches using firebreaks (i.e., forage kochia) as proposed by the BLM fuels experts (L Okeson, pers. comm.). As restoration activities progress, firebreaks may be modified (i.e., replaced with native vegetation to connect restored areas and planted around the newly restored and connected patches) to help ensure protection from future fire.

Likewise, much effort has been expended on habitat enhancement in SRBOP, yet we know very little about what factors influence success and failure. GEAS proposes a restoration approach that is informed by ongoing research, designed to test and improve our knowledge as restoration is implemented, spatially explicit, and timed to appropriately capitalize on optimal weather conditions.

Ongoing restoration research carried out by the NCA Restoration Working Group is well suited to inform the Companies restoration efforts as they develop new techniques and understand the importance of seasonal and annual timing of implementation as a key factor influencing success (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.). The Work Group should be a key element of project planning and their published information and monitoring data should be employed as specific strategies are developed.

Restoration initiated through the Enhancement and Mitigation Portfolio should start with these data in hand. Initial restoration plots should be placed and planted so they build upon and improve the research data, and bridge to application at larger spatial extents. That is, plots should be placed in areas that will eventually connect remnant native vegetation patches and seeded/planted in a range of treatments the Work Group research shows have higher success probabilities. This approach is critical to prepare for the second, larger application: because the actual restoration implementation must be timed with optimal weather, this “learn-do” approach will increase the likelihood of success when full implementation occurs.

GEAS recommends that this restoration approach begin with the identification of the key remnant native sagebrush patches within the SRBOP that exhibit ecological integrity and are still “intact”. These areas are the “base” for this type of approach. The second step would focus

restoration efforts in areas between these key remnant patches in an effort to connect these key areas together. The overall goal of this approach is to eventually create ecologically intact, large, and connected sagebrush areas important for the many species that thrive in these conditions.

The timing of restoration actions as specified above and success for restoration is dependent upon precipitation (large rain events) in the spring before restoration actions (planting, etc.) occur. It is imperative that restoration funds be flexible. Funds must be banked and allocated when the conditions are right for restoration actions. The restoration fund can be accessed when the conditions are prime for restoration actions. GEAS recommends the funding committed by the Companies be established as a Trust Fund which is managed by a Board or Oversight Committee. The Committee should have discretion to apply or reserve funding in a time-sensitive context (i.e., commit restoration funds in positive weather years). The Trust would serve a second function as a pot of ‘matchable’ dollars that could attract additional funds to augment restoration of SRBOPA.

As restoration actions occur, monitoring must be implemented to quantify and understand where and why success rates are high, address challenges and failures, and allow for adapting the restoration approach over the years so that the dollars spent on restoration will be successful over the long-term. The Portfolio fails to specify a monitoring effort. This is an important aspect that must be addressed and is crucial to the success of this approach. If vegetation reestablishment is the goal, then appropriate vegetation monitoring protocols must be put in place with data collected both before and after construction on the line, within the key remnant sagebrush patches, and at sites designated for restoration and mitigation.

Monitoring needs to be carefully considered and matched to expected outcomes temporally and ecologically. For example, restoration actions over a relatively small proportion of SRBOP are not likely to have measurable effects on, for example, prairie falcon populations across the entire SRBOP. It may, however, have some influence on nest success or breeding density of proximal nesting territories. Likewise, demographic response by prairie falcons may lag habitat recovery by several years. These examples illustrate the need for a thoughtful monitoring approach that begins with fine-resolution, vegetation monitoring and eventually scales to measuring the response by raptors that are most likely to be influenced by the restoration. The monitoring strategy should be implemented using an experimental design, where “control areas” and “experimental areas” are monitored so that comparisons can be made to determine successes, address failures, and inform late stage and future restoration actions accordingly. Again, this monitoring effort is critical to the adaptive restoration process and is required by BLM regulations.

GEAS proposes action on an overall approach that meets the enabling legislation and RMP guidance, employs the best science while engaging the fuels expertise at BLM, and sets the stage



for a more programmatic approach to habitat recovery in the SRBOP. Coordination between BLM land managers and ecologists, the Companies' natural resource and administrative specialists, and the NCA Restoration Working Group is critical to implement this approach. GEAS is committed to this collaborative, adaptive approach and pledges continued participation where appropriate.

## **Additional Comments on Enhancement and Mitigation**

### **Recreational Shooting**

Although not directly addressed in the Portfolio, GEAS members are strongly in favor of a shooting closure within 200 yards of new and existing powerlines as well as access roads. A shooting closure is consistent with and supports a range of recommendations and offerings in the Portfolio. For example, the Portfolio indicates that, "access roads ... may increase the risk of vandalism ... (page 32)." A shooting ban of 200 yards from roads and powerlines would be enforceable (consistent with Law Enforcement provisions, page 37) and discourage both firearm-caused vandalism and additive mortality to raptors and prey. Furthermore, we contend that one of the greatest threats shooting brings to the SRBOP is the potential for fire ignition. There are numerous incidents of target-shooting-related fire ignitions in southwest Idaho, some of which sparked immense, destructive blazes. Wildfire is a recognized threat to native vegetation (and consequently small mammals and raptors) in the SRBOP and an economic threat to the powerlines. A shooting ban would reduce all of these threats and, when paired with increased law enforcement, is completely enforceable.

### **Vegetation Restoration (reclamation)**

Regarding plant/seed mixtures: Page 36 states "mixes should include shrubs that are suitable for small mammals." *While we don't argue with this intent, we expect that shrubs and forbs planted and seeded need to be a close match to the local soil and climate conditions... i.e., native plants. It's important this is clearly stated.*

Regarding the need for better (more accurate and precise) maps of proposed restoration: I.e., "... developing a geodatabase layer using the proposed facility locations and then overlaying that "footprint" database, whether for construction or operation footprint, with the relevant vegetation or land ownership geodatabase layer." GEAS recommends the restoration effort be fully informed with highly accurate spatial data and planning. SRBOP is one of the best-mapped areas in Idaho with a long history of spatial data. In preparation for spatial planning, the best available data on historic restoration activity and restoration research should be overlaid with topography, soils, fire perimeter and other GIS layers to ensure proper construction siting, mitigation siting and restoration actions.

Page 36: “in accordance with the RMP, habitat restoration projects should be located in areas where it is most beneficial to raptor prey populations” therefore a spatial component to the restoration exercise is essential.

Need ‘security’ fund for fire response on top of management; page 32 cites a concern that “access roads ... may increase risk of vandalism, weed infestation, litter, etc.” We feel that the increased risk of fire ignition is the most critical threat posed by increased access. Some 80% of fire ignitions in the NCA are human-caused (L. Okeson, pers. comm.). We agree, that access also means quicker response to fire ignition but we also know that fires expand rapidly. Therefore we suggest a dedicated effort to sign the areas regarding risks and costs of wildfire and a proactive effort to deter ignitions (including a firearm ban).

#### Raptor nest/perch augmentation

Proactive retrofitting is an important element especially to honor the intent of the NCA as a world-renown site for Birds of Prey (NCA not an end unto itself ... they are identified and situated for specific resource functions; SRBOP specifically designated for raptors, use for other purposes must be compatible with enhancements for BOP). GEAS recommends retrofitting existing structures where appropriate to enhance nest and perch sites for raptors.

Leave structures on removed lines

Page 39 and 40, referring to removal of Swan Falls to Bowmont line and Mountain Home to Bennet line: GEAS recommend the Companies do not remove structures that are suitable for raptor and raven nest and perches. We recognize there may be safety considerations but recommend that all structures that are not deemed unsafe be left. In addition to opportunities for raptors and ravens, many cavity nesting (excavators and secondary) will benefit from the nest site opportunities. Furthermore, a wide variety of birds would benefit for the elevated perch opportunities.

We recommend that cost savings of structure removal be redirected to (1) decommissioning and restoration of the service roads for these lines (thus improving and protecting slickspot peppergrass habitat), and (2) enhancements on the primary lines.

GEAS recommends the Enhancement Portfolio reference using ‘state of the art’ guidelines to add desirable nest opportunities.

## Monitoring

As stated above, monitoring needs to be a specific element of the Portfolio. GEAS recommends that the Portfolio references the BLM Assessment Inventory and Monitoring program and any local (i.e., NCA specific) monitoring protocols and specifically describes the need for targeted monitoring of vegetation response to restoration, small mammal population trend, and raptor response to nest and perch enhancement. Monitoring is best conducted under an experimental design so trials inform subsequent efforts and expenditures.

### *Vegetation*

Page 36: ... “to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded.” Monitoring of upland native shrub is critical to measure success of restoration actions.

### *Prey base*

Page 36: Citing the SRBOP RMP: the greatest benefit to raptors is in the stabilization of the prey base” thus no amount of restoration nor reclamation will meet RMP standards unless the prey base responds and the only way to accurately test this is through monitoring of the prey populations themselves.

### *Raptors*

Monitoring protocols should be put in place to understand the effects of the line and help target measures to address any negative impacts through further management action. Ultimately enhancement measures should improve or at least maintain current population numbers in the area.

Again, Golden Eagle Audubon Society Board of Directors appreciates this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We look forward to further engagement in successful siting of the Gateway West line in SRBOP and in successfully enhancing native vegetation, small mammal, and raptor communities in southwest Idaho.

On behalf of the Golden Eagle Audubon Society Board of Directors,

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## **ATTACHMENT C**

### **Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA**





## **Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA**

Staff from the BLM Boise District and the US Geological Survey (USGS) Forest and Rangeland Ecosystem Science Center (FRESC) planned and implemented a workshop in June 2008 to form a strategy to monitor raptors in the NCA (USDI 2008). The workshop included 37 scientists, specialists, and managers met to “develop an adaptive management framework for raptor monitoring for the NCA to include regular long-term monitoring to assess raptor status, and monitoring related to specific management or projects.”

Objectives of the workshop were to:

1. prioritize raptor species for long-term monitoring,
2. recommend efficient wildlife monitoring designs to assess the conservation and enhancement of raptor populations and habitats in the NCA, and
3. propose how raptor (and/or other species) monitoring can be used to evaluate vegetation treatment projects implemented in the NCA

This attachment summarizes findings and recommendations of the workshop group that addressed monitoring raptor status and trends in the NCA. A full report of the workshop is presented in USDI (2008). Workshop participants recommended that monitoring should be designed to detect change and prompt a management decision if change exceeds an acceptable standard or pre-determined threshold. In general, upon detecting an unacceptable change or trend, additional investigation(s) should be conducted to gain more detailed understanding of cause-effect relationships, mechanisms, etc.

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### **RESPONSE OF WORKSHOP PARTICIPANTS TO THE QUESTIONS:**

Because questions 1 and 2 are interrelated, both questions were addressed simultaneously in discussing the approaches for the different species.

**Question 1. Which raptor species warrant intensive long-term monitoring and what monitoring designs are effective for assessing the status of these species, as well as generate information on the other raptor species?**

**Question 2. How often should various raptors be surveyed and what should be the periodicity of monitoring**

The report recommended a 2-tiered approach for monitoring raptors that included intensive monitoring for priority species and a less intensive strategy for multiple species. Workshop participants identified Golden Eagles, Prairie Falcons, Ferruginous Hawks, and Burrowing

Owls as priority species with the eagles and falcons as the top priority. The less intensive strategy would focus on the benchland and wintering raptors. Benchland nesting raptor species, specifically included Burrowing Owl, Ferruginous Hawk, Northern Harrier, and Short-eared Owl. *The term “benchland” refers to the plain surrounding the Snake River Canyon (USDI 1996:9).* Wintering raptor species, specifically Rough-legged Hawk, Northern Harrier, Red-tailed Hawk, Golden Eagle, and Prairie Falcon.

Golden Eagles and Prairie Falcons were considered top priority because:

- These species were cornerstones in establishing the NCA
- A vast background data has been collected on them from which to detect change (40+ years for Golden Eagles and periodically over 30 years for Prairie Falcons).
- They utilize different prey that vary over time, and eagle and falcon populations fluctuate differently based on previous research
- The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and jackrabbit status is associated with shrub habitat condition.
- The Prairie Falcon is a ground squirrel specialist during the breeding season and is sensitive to changes in ground squirrel abundance as a result of climate change and habitat alteration.
- Most Prairie Falcons leave the NCA following ground squirrel estivation, and factors affecting falcons can extend beyond the NCA. Trends in numbers may reflect conditions on and off the NCA, and migratory species, such as Prairie Falcons, may be affected more by climate change than resident species.
- The NCA contains a low number of nesting eagle pairs, and loss of a few nesting pairs should trigger new action by managers.
- Historical counts of falcon pairs have revealed high year-to-year variability
- Analyses of change can be across the NCA or more locally.
- Nesting eagles are relatively inexpensive to monitor compared with data gained.
- Surveyors can effectively gather other data (e.g., covariates).
- The NCA is one of the few places where Prairie Falcons have been studied and monitored in the long-term.
- Prairie Falcons have large home ranges that encompass much of the area within the NCA
- The Golden Eagle is a FWS Bird of Conservation Concern in BCRs 9 (where the NCA lies), 16, 17, 18 & 35, and the FWS is interested in eagle monitoring in the NCA.
- The Prairie Falcon is a FWS Bird of Conservation Concern in BCRs 9, 10, 16, 17, 18 and 32, which comprise the bulk of its range in the U.S.
- The number of Golden Eagles using the NCA approximately doubles in winter with influx from other areas

Ferruginous Hawks and Burrowing Owls were considered priority species because:

- These species nest on the benchlands above the canyon, although Ferruginous Hawks also nest in the canyon.
- They use different vegetation types and prey than Golden Eagles and Prairie Falcons.
- Ferruginous Hawks use shrub and grassland habitats.
- Burrowing Owls use grassland cover types, and owl abundance, distribution, and use of areas is likely to change if shrubland restoration succeeds.
- Preliminary data show no evidence for declines in the Ferruginous Hawk nesting population in the NCA (see Appendix 4). Monitoring would provide for a solid baseline and continued assessment of status
- The Ferruginous Hawk is a FWS Bird of Conservation Concern and BLM Sensitive Species Type 3
- The Burrowing Owl is a FWS Bird of Conservation Concern throughout most of its U.S. range (BCRs 9, 11, 16, 17, 18, 32, 33, 35, 36) and is a BLM Sensitive Species Type 5

### **Recommended Monitoring for Priority Species**

**Golden Eagles.** Workshop participants recommended that the annual survey of all historical nesting territories in the NCA and in the Comparison Area (the area along the Snake River located upstream and downstream of the NCA) continue as it has for the last 40 years. The annual survey includes assessment of occupancy and productivity.

The quantitative goal of monitoring depends on the location of decline in the NCA and whether it is geographically local or widespread. The goal is to detect change (rate of change or change below an established threshold) in the number of pairs and/or productivity. Participants suggested a loss of 3-4 nesting pairs as a threshold that would trigger action

Management actions: An unacceptable change would trigger a decision to investigate what factors (e.g., fire, OHV and other human disturbance, restored vegetation, etc.) might be associated with the change in nesting pairs or productivity, relative to the location of the change. Investigations and management actions should consider the time frame for recovery. Eagles are long-lived, which could result in a long time for recovery. The BLM should focus vegetation restoration efforts within 3 km of the canyon rim, or within 3 km of nests outside of the canyon.

Threats to Golden Eagles include vegetation type conversion from shrubs to annual grasses, and human activities - recreation (mainly OHV disturbance). [NOTE: *Abandonment equals take if caused by human activity...Diana Whittington (US FWS) stated that human disturbance to nesting Golden eagles (or the permitting of such) that causes loss of any production in a given year is a violation of the Bald/Golden Eagle Act.*]

**Prairie Falcons.** The group recommended monitoring falcon abundance and nesting success 3 of every 5 years. One year to consist of a full canyon survey as was done in 2002, and the other 2 years to consist of a stratified random sample of sections of canyon with high and low nesting densities as was done in 2003.

Information from assessing annual nesting success could be adequate to monitor Prairie Falcon reproduction in the NCA because nesting success [the proportion of preselected pairs raising at least one young to  $\geq 30$  days of age (see Steenhof and Newton 2007)] and productivity (mean number of young reaching  $\geq 30$  days of age per preselected pair) are highly correlated. It cost about \$120,000 to conduct a full canyon survey and collect productivity data in 2002. Using the cost of a full canyon survey with productivity as a base, a full canyon survey with just nesting success would reduce the base cost about 15% and a stratified random sampling effort like that used in 2003 combined with only assessing success would reduce the cost by about 35%. Information on other species (i.e., Red-tailed Hawk and Ferruginous Hawk) also can be collected from the Prairie Falcon point-count surveys.

Participants recommended that the quantitative goals of monitoring be to 1) identify trajectories in the number of nesting pairs and/or nesting success occurring over multiple years in a geographic cluster within the survey area, 2) detect substantial changes in the number of nesting pairs and/or nesting success across larger areas (*substantial change was not defined at the workshop*), and 3) ascertain when the number of pairs falls below the historical minimum of 160 recorded in 1994. Some members of the group cautioned about using absolute thresholds. These levels should serve as triggers for further investigation not as triggers for panic.

*Management actions:* A decline in the number pairs or nesting success beyond the acceptable level would trigger a management decision to investigate the reasons for the decline. The 1997 survey was a good example of this management process. Results from long-term surveys in selected stretches of the canyon in 1997 indicated a significant decline in the number of falcon pairs. NCA management implemented a full canyon survey in 2002, and results indicated that the number of nesting pairs that year was back at historical high levels.

### **Recommendations for less intensive monitoring for multiple species**

**Raptors that nest on the benchlands.** Workshop participants recommended that monitoring focus on:

- Burrowing Owls
- Ferruginous Hawks
- Northern Harriers
- Short-eared Owls.



The Burrowing Owl should be a focal species for the ecological communities on the benchlands. Short-eared Owls and Northern Harriers can be nomadic, and numbers vary widely from year to year in the NCA, which is an important consideration for the monitoring design. Year to year changes in local numbers are likely to reflect nomadism as much as they reflect population changes. The Short-eared Owl is a FWS Bird of Conservation Concern and a BLM Sensitive Species (type 5). Swainson's Hawk were not a great concern in the NCA because of low number of pairs.

**Recommended monitoring approach:** The standardized roadside point-count survey method described in Conway et al. (2008) and Conway and Simon (2003) was recommended for surveying Burrowing Owls and the other species. Routes should be established with some structured sampling frame. Conway and Simon (2003) recommend one route per township. Participants recommended using the existing road network for transects and broadcast surveys for Burrowing Owls and the other species where applicable. When pairs are located, surveyors can search the area of activity to find a nest and assess productivity or nesting success.

Workshop participants recommended that the use of transects for multiple species should be examined further to address the following:

- whether transects should be surveyed year round.
- what information would be collected from the transects—trend over time?
- how nesting success can be assessed from transects.
- what changes can be detected to trigger a management decision?

**Wintering raptors.** The following species were identified for monitoring on the benchlands:

- Rough-legged Hawk,
- Northern Harrier
- Red-tailed Hawk
- Golden Eagle
- Prairie Falcon

Some participants felt that a measure of raptor use would be a good indicator of restoration success. *[There were differing opinions on this statement. Some Group I participants and Group III (see Statement 1 of Question 2 of Group III) did not agree with the statement, and Group II felt that the approach should be evaluated (see recommendation 4, Question 1)].*

Data from past studies should be evaluated to assess if comparisons can be made with new survey data. John Doremus collected wintering data on certain species. Bill Mattox and James McKinley surveyed road transects from 1998 to 2005 that included all raptor species detected in the Orchard Training Area within the NCA. Also Watson et al. (1996) recorded raptor

species occurrence collected from randomly distributed point counts during the BLM/IDARNG Research Project

*Recommended monitoring approach:* Participants believed that point-count surveys could be conducted from randomly dispersed points or points along transects. The group recommended use of the roadside point-count survey method. A monitoring plan should consider surveying year-round benchlands road transects during the two years in five when Prairie Falcon monitoring is not being done (see Prairie Falcons 2,a above). [ *Note: the recommended periodicity (number of times in a year) of the surveys was not discussed at the workshop and will be addressed in the NCA monitoring plan*]. Workshop participants recommended that surveyors collect other data (e.g., weather, habitat, land use, etc.) as covariates to detect factors influencing birds. The specific covariates will be identified in the planning process. Also the monitoring design should consider stratified random sampling based on management needs.

**General Discussion.** Some participants suggested the BLM identify and monitor raptor migration corridors in NCA. Also, some asked if we are comfortable with our knowledge of status and our estimates for raptors in NCA (excluding Prairie Falcons and Golden Eagles). Also should the BLM consider a comprehensive assessment / inventory as a basis for monitoring the status of species and their response to management activities?

**Question 3. Which raptor species provide the most reliable data to evaluate long-term (i.e., 20 years) habitat restoration success across the NCA?**

Golden Eagles and Prairie Falcons were listed because these two species have different primary prey species that are associated with shrubland habitats. Black-tailed jackrabbits (the eagle's main prey) require shrubs. Although Piute ground squirrels (the falcon's main prey) do not require shrubs, their populations are more stable in shrub habitats. Eagles have a relatively small home range compared to the falcon's large home range, which provides managers with a reflection of impacts at different scales and locations. The Golden Eagle population is relatively stable vs. Prairie Falcon's variability in occupancy/productivity.

Raptor use of restored areas vs. untreated areas needs to be assessed, but the challenge is how to do it. Some participants suggested using solar powered GPS satellite-received transmitters on female Prairie Falcons to assess use of treated and untreated areas. *Note: Some participants felt that data from males might be more revealing if transmitters of the appropriate size are available.* Participants recommended that treatment and control experiments should be monitored before, during, and after treatments.

## **RESEARCH QUESTIONS**

The group suggested that protocols be established to assess the array of research questions so that studies can complement each other. Participants identified the following research questions:

- Why are some Golden Eagle territories that have burned more productive than others? (Diet studies may be one way to approach this question.)
- What is the trade-off of using non-natives in vegetation restoration vs. no action?
- Can Loggerhead Shrikes be used as an indicator of restoration success?

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**Appendix I**  
**SEIS Scoping Report**



# **SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT SCOPING REPORT**

## **Gateway West Transmission Line Project**

*Prepared for:*



**Bureau of Land Management**

January 7, 2015

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## 1.0 INTRODUCTION

This report describes the public scoping process for the Gateway West Transmission Line Project (Gateway West or Project) Supplemental Environmental Impact Statement (SEIS). It documents outreach efforts, summarizes the comments received, and identifies any issues raised and suggested alternatives to the proposed action. Comments will be addressed in the Draft SEIS rather than in this summary. The document has been prepared for the public, the decision-maker, and SEIS team members to easily see the common themes in scoping comments, and issues. Issues generated from these comments, as well as issues considered in the 2013 Final Environmental Impact Statement (FEIS) will be used to analyze Project effects in the Draft SEIS. The Draft SEIS will include a table with a brief description of how each comment was handled during development of the Draft SEIS.

The U.S. Department of the Interior, Bureau of Land Management (BLM) conducted scoping initially in 2008. In the summer of 2009, additional routes were added for consideration and the BLM asked for additional comments. The original set of issues developed from these scoping comments are attached as Appendix A. Additional scoping comments submitted for the SEIS, as well as the codes used to group like comments, are grouped by issue and attached as Appendix B. Scoping is an ongoing process, and comments received after the close of the SEIS scoping period (October 24, 2014) will be considered in the SEIS when it is feasible; however, those comments have not been summarized in this report.

## 1.1 BRIEF PROJECT DESCRIPTION

On May 7, 2007, Idaho Power Company and PacifiCorp (doing business as Rocky Mountain Power), collectively known as the Proponents, applied to the BLM for a right-of-way (ROW) grant to use the National System of Public Lands for portions of the Project. The original application was revised in October 2007, August 2008, May 2009, and January 2010 to reflect changes and refinements in their proposed Project and in response to feedback from the public regarding routing alternatives. The Plan of Development (POD) has been revised several times in response to Project changes and recommendations from BLM, other reviewing agencies, and public comment. The Proponents submitted a revised application for Segments 8 and 9 in August 2014. The BLM will consider this application in accordance with 43 Code of Federal Regulations (CFR) 2800, and decide whether to issue the ROW Grant for one or both of these segments.

The original Project consisted of rebuilding one 230-kilovolt (kV) line and constructing two new 230-kV lines between Windstar and Aeolus; a 345-kV line to connect the new Anticline Substation to the existing Jim Bridger Substation; and 500-kV system from Windstar to Hemingway, comprising 10 transmission line segments with a total length of approximately 1,103 miles. The Project would extend from the Windstar Substation (located near the Dave Johnston Power Plant in Glenrock, Wyoming) to the Hemingway Substation (located near Melba, Idaho, approximately 20 miles southwest of Boise, Idaho). The eastern route 230-kV line and the 500-kV line between Windstar and Aeolus were dropped prior to the Draft Environmental Impact Statement (DEIS), resulting in a Project with a total length of approximately 1,000 miles.

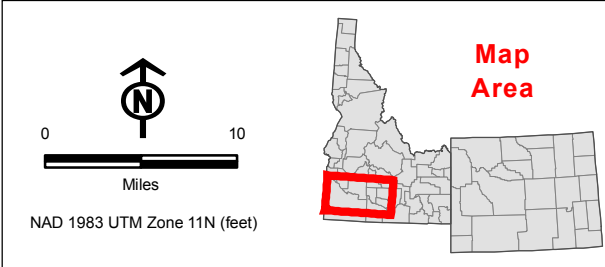
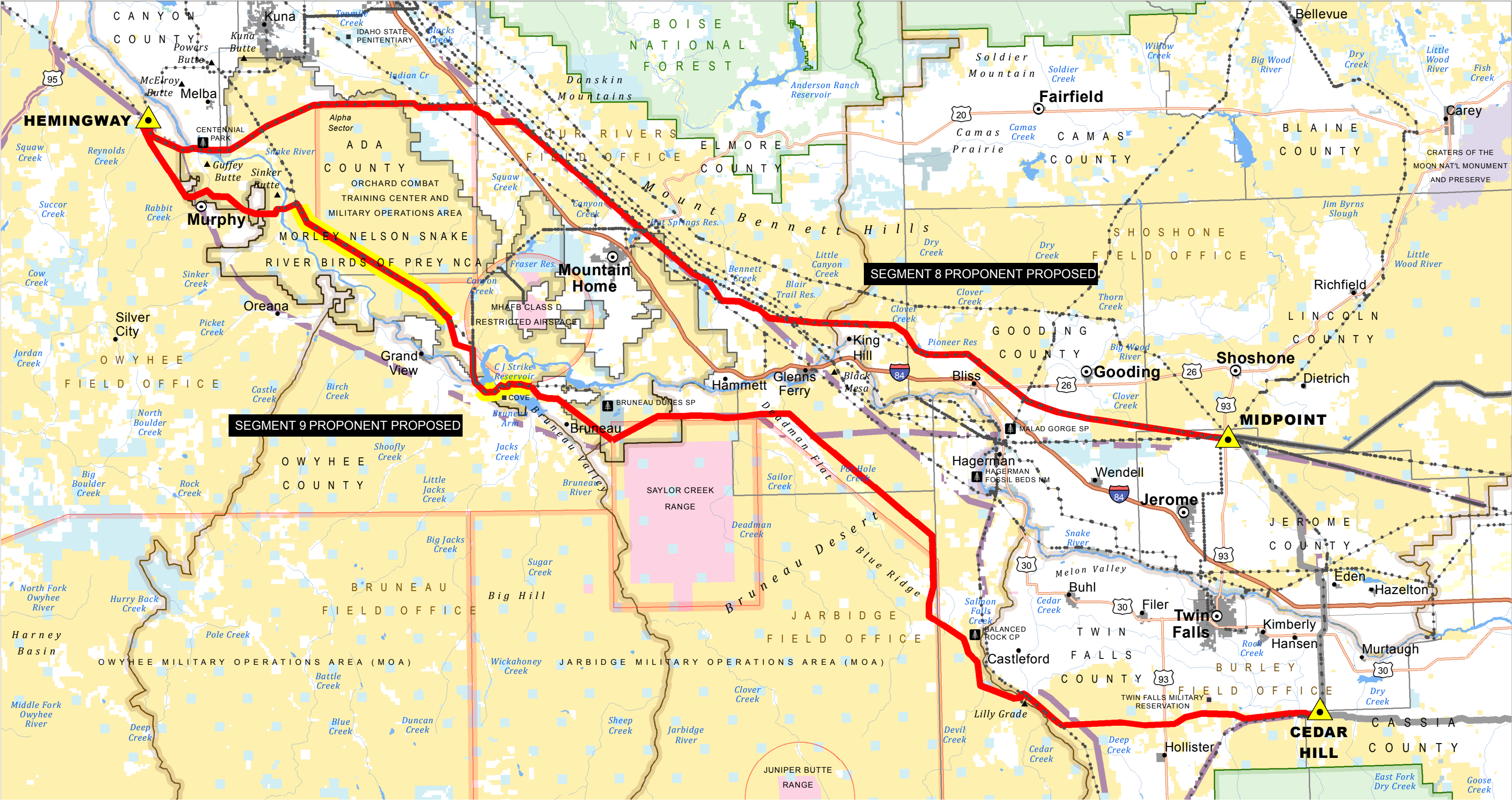
The BLM published the FEIS for this Project on April 26, 2013, and a Record of Decision (ROD) on November 14, 2013. In that ROD, the BLM deferred offering a ROW grant for 2 of the 10 segments (e.g., Segments 8 and 9) to allow additional time for federal, state, and local permitting agencies to examine additional options regarding routing of these segments as well as mitigation and enhancement measures for these segments.

New information has become available since the publication of the FEIS and ROD regarding Segments 8 and 9. The BLM requested the Boise Resource Advisory Council (RAC) to establish a subcommittee to examine options for resolving siting issues associated with Segments 8 and 9. The RAC subcommittee considered numerous routing, most of which were similar to the routes already considered in the FEIS. They also considered design options not previously studied in detail. The majority of the subcommittee members submitted a set of recommendations to the full RAC. The RAC adopted the majority recommendations and submitted these to the BLM. The Proponents adopted the RAC recommendations and revised their application in August 2014. They also submitted a draft Mitigation and Enhancement Portfolio (MEP) with their application. The MEP contains proposed mitigation and enhancement measures, including compensatory mitigation, and other measures intended to enhance resources and values found in the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).

Project activities include construction of two 500-kV transmission lines and associated access roads and communication sites. The support structures would generally be steel lattice structures. A portion of Segment 8 would be located 250 feet from an existing 500-kV line, rather than 1,500 feet from this line as proposed in the FEIS. A portion of Segment 9 would involve removal of an existing 138-kV line and construction of a new double-circuit line, with both the 138- and 500-kV lines on new steel pole structures. These design features are included in the Proponents' new application and were not addressed in the 2013 FEIS. These design features and the new information provided in the Proponents' MEP are the main drivers in determining the need to prepare a supplement to the FEIS.

**Figure 1** shows the Proponents' revised proposed routes for Segments 8 and 9.





Project Features

- Proponent Proposed Routes
- 500/138-kV Double Circuit
- Previously Approved ROW



Substation

Other Features

- Existing Transmission Lines (138-kV or greater)
- West Wide Energy Corridor (WWEC)



Morley Nelson Snake River Birds of Prey NCA



BLM Field Office



National Forest



Military Operating Area



County



City Limits

Land Status

- Bureau of Land Management
- National Forest
- National Park Service
- Fish and Wildlife Service
- Bureau of Reclamation

Military

- Reservation/Corps of Engineers
- State
- State Wildlife, Park, Recreation or Other
- Private



Gateway West  
Transmission Line Project

Figure 1 Segments 8 and 9  
Proponent Proposed Routes

## 2.0 SCOPING PROCESS

This section provides a description of the public scoping process, the techniques that were used to notify the public about their opportunity to be involved in scoping, and a brief summary of the public scoping meetings. The scoping comment period began on September 19, 2014, and ended on October 24, 2014.

### 2.1 SCOPING ANNOUNCEMENTS

Initiation of the EIS process and the public scoping meetings were announced through the *Federal Register*, press releases, and the BLM Idaho Project web site ([http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.html](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html)) as described below.

#### 2.1.1 Federal Register

The Gateway West public scoping process began with the publication in the *Federal Register* of BLM's Notice of Intent (NOI) to (1) prepare an SEIS to support BLM's consideration of the Proponents' August 2014 application for a ROW grant to use public lands for portions of the Gateway West Transmission Line Project; and (2) conduct public scoping meetings. The NOI was published on September 19, 2014 (Volume 79, Number 182, pages 56399 to 56401). The NOI is presented in Appendix C-1 and on the Project web site, referenced above).

#### 2.1.2 Scoping Materials

BLM prepared news releases to introduce the Project, announce the scoping period, and publicize the scoping meetings and their respective locations. The news releases were posted on the Wyoming BLM Project web site (see BLM News Releases contained in Appendix C-2). The "Why Are We Here" handout distributed at the scoping meetings is included in Appendix C-3.

#### 2.1.3 Media Releases and Public Service Announcements

Announcements regarding the public scoping meetings and scoping process were issued as news releases to local and regional newspapers, radio stations, and TV stations in Idaho and Wyoming. Legal notices were published in the newspapers of record. **Table 1** shows the newspapers that printed the legal notice.

**Table 1.** Legal Notices in Newspapers of Record

Publication	Publication Location
<i>The Idaho Statesman</i>	Boise, Idaho
<i>Kuna Melba News</i>	Kuna, Idaho
<i>The Owyhee Avalanche</i>	Murphy, Idaho
<i>Glenns Ferry Gazette</i>	Glenns Ferry, Idaho
<i>Mountain Home News</i>	Mountain Home, Idaho

Flyers with information about public meetings were posted at various public locations in communities where meetings were held. A list of locations is shown in **Table 2**.

**Table 2.** Meeting Posters Displayed in the Community

<b>Business/Building</b>	<b>Location</b>
<i>Arctic Circle</i>	Kuna, Idaho
<i>Kuna Public Library</i>	Kuna, Idaho
<i>Paul's Market</i>	Kuna, Idaho
<i>U.S. Bank</i>	Kuna, Idaho
<i>U.S. Post Office</i>	Kuna, Idaho
<i>Murphy General Store</i>	Murphy, Idaho
<i>Owyhee County Courthouse</i>	Murphy, Idaho
<i>Owyhee County Historical Museum</i>	Murphy, Idaho
<i>U.S. Post Office</i>	Murphy, Idaho
<i>Cook's Food Town</i>	Gooding, Idaho
<i>Franklin Building Supply</i>	Gooding, Idaho
<i>Gooding City Hall</i>	Gooding, Idaho
<i>Gooding Public Library</i>	Gooding, Idaho
<i>Lupita's Boutique &amp; Tienda</i>	Gooding, Idaho
<i>Main Locke Insurance</i>	Gooding, Idaho
<i>Ridley's Food &amp; Drug</i>	Gooding, Idaho
<i>U.S. Post Office</i>	Gooding, Idaho
<i>Wells Fargo Bank</i>	Gooding, Idaho
<i>Ziggy's Gas &amp; Grub</i>	Bliss, Idaho

### 2.1.4 Public Scoping Meetings

BLM hosted four public meetings in October 2014 to provide planning and National Environmental Policy Act (NEPA) information to the public and agencies and allow them to identify issues and concerns to BLM. Public scoping and the scoping meetings were publicized on the BLM project web site, and through the local media. As summarized in **Table 3**, a total of 189 members of the public attended the various public meetings.

**Table 3.** Public Scoping Meeting Dates, Locations, and Attendance

<b>Meeting Date</b>	<b>Meeting Location</b>	<b>Attendance</b>
October 7, 2014	BLM Boise District Office Boise ID	44
October 7, 2014	Kuna Senior Center Kuna, ID	51
October 8, 2014	Gooding Fairgrounds Gooding, ID	9
October 9, 2014	Owyhee County Historical Museum Murphy, ID	85
<b>Total Attendance</b>		<b>189</b>

A scoping packet was provided to all who attended the public meetings and is also available on the BLM's web site ([http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.html](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html)).

## 3.0 COMMENT ANALYSIS

### 3.1 COMMENT ANALYSIS

The Council on Environmental Quality regulations for implementing NEPA define scoping (CFR 40 §1501.7) as a way to determine the scope of the analysis, significant issues to be analyzed and non-significant issues.

To accomplish this, all comments submitted were reviewed by a team of analysts. The team was instructed to organize comments in the following four categories:

- Purpose and Need for the Project.
- Alternative Development Comments – These are comments that indicate another alternative needs to be reviewed.
- Alternative Description and Mitigation Measures – These comments suggest modifications to already defined alternatives that reduce or avoid potential impacts.
- Effects Analysis – These comments specify concerns over the effects on resources or suggest effects that need to be considered and disclosed.

### 3.2 PROCESSING COMMENTS

The BLM received the comments reviewed for this report in a variety of ways—written and electronic comments submitted at the scoping meeting, written and electronic comments submitted to the BLM during the scoping period, and electronic comments submitted to the BLM web site. All communications received were saved electronically, stored in the communications management system, and assigned a comment number; available information about the commenter was also captured (e.g., name, address, e-mail). If multiple versions of the same communication were received, the original communication was assigned a NEPA number and added to the communications management system. Although subsequent versions were not added to the database in order to prevent duplication, all contributing commenters were documented and assigned to the original communication.

Once a comment was identified as being one of the types listed above, it was coded to correspond with a category shown in Table 4 (in the next section). Some comments fit into more than one category. The coding structure was established before analysis began, so not all of the codes listed were used. The list of comment codes is included in Appendix B. In total, 74 letters and cards, 36 emails, and 3 phone calls were received. In addition to these comments, applicable public and agency comments from the original NEPA effort were considered (see Appendix A to this report).

### 3.3 SCOPING COMMENT SUMMARY

A total of 740 individual comments were identified and coded. The major comment categories are presented in **Table 4**. Appendix B to this report includes the list of codes (Appendix B-1) and a table with the coded comments (Appendix B-2).

**Table 4.** Main Comment Categories

<b>Category (codes)</b>	<b>Number</b>
Comments on the NEPA process and the scope of the analysis (10000, 15000, 18000, 45000, 46000)	34
Comments on the purpose and need (11000)	4
Comments on the proposed action (14000, 47000, 48000)	33
Comments on the relationship to other federal policies, including use of Designated Corridors (12000, 13000)	15
Comments that were considered “out of scope” other than comments on segments 1-7 and 10 (10010)	7
Comments on Tribal consultation and treaty rights (21000)	0
Comments in support of the project and/or the proposed action (16000, 50010, 51010)	154
Comments in opposition to the project (17000)	4
Comments on other routes and general comments on segments 8 and 9 (50000, 50020, 50030, 51000, 51020, 51030)	50
Comments on general environmental issues (22000)	0
Comments on Mitigation, Enhancement, and Monitoring (19000, 20000, 35010 to 35040)	70
Comments on land use and related issues (34000 to 35000)	105
Comments on wildlife, wildlife habitat, and vegetation (27000 to 27040, 28000 to 28080),	94
Comments on scenery and visual resources (23000)	26
Comments on cultural resources and historic trails (24000, 24010)	21
Comments on socioeconomic issues (25000 to 25060, 26000)	56
Comments on agriculture other than economic (37000)	8
Comments on recreation (36000, 36010, 36020)	12
Comments on minerals, soils, paleontological resources (29000, 30000, 32000)	0
Comments on water resources and use ((33000)	6
Comments on air quality, including greenhouse gases (39000)	1
Comments on transportation (38000)	15
Comments on geologic hazards, safety, and electrical environment (31000, 40000, 41000, 42000)	17
Comments on projects effects on the State and Counties (57000, 58000)	5
Comments on cumulative effects (43000)	3
Comments on consultation other than Tribal (44000)	0



## **4.0 ISSUES IDENTIFIED DURING SCOPING**

### **4.1 NEPA PROCESS**

Comments focused on what the SEIS should include and how the SEIS would relate to the FEIS. The State of Idaho and others commented that the NEPA analysis should not be duplicative of the work done in the FEIS and must be limited to new routes developed in the scoping process. Other comments (including from environmental organizations) suggested that a wide range of routes and/or alternatives must be considered in this analysis. Some specifically recommended that all RAC options be considered in the analysis. One organization commented that segmenting the project decision was a violation of NEPA and that all of Segments 8 and 9 must be considered in this analysis. Several people thought one or all of Segments 1 to 7 and 10 should be reconsidered now that the 1,500-foot separation requirement has been revised.

Some comments recommended specific literature or other information that should be used in the analysis. Some stressed the importance of acquiring complete baseline data for the analysis and/or the use of best available science. The need to evaluate the MEP in the SEIS was identified as an important component of the NEPA analysis in many of the comments.

### **4.2 PURPOSE AND NEED FOR THE PROJECT**

Several comments questioned the need for the Project or the need to construct two new lines rather than one. Some landowners suggested there was no need to build new lines and recommended adding the new lines to existing towers.

### **4.3 PROPOSED ACTION**

The majority of comments supported the proposed routes; however, many comments questioned the adequacy of the MEP filed as part of the proposed action. Some comments also questioned the adequacy of the mitigation proposed for areas outside the NCA. The State offered to assist the BLM in developing mitigation and enhancement measures.

Several comments recommended that all of Segment 8 (e.g., from Midpoint to Hemingway) be co-located with an existing line. Some stated that Segment 9 should also follow existing lines. Several comments questioned the need for two separate lines or thought that Segments 8 and 9 were alternatives to each other.

Two environmental organizations requested that the proposed action be tiered to the current Idaho Comprehensive Wildlife Conservation Strategy, a guiding conservation strategy document for western states. In addition, they recommended that any “plan amendments designate Areas of Critical Environmental Concern or otherwise to enhance and increase biological value, visual resource, or other important protections.”

### **4.4 RELATIONSHIP OF THE SEIS TO OTHER FEDERAL POLICIES**

Most comments focused on the need to meet the requirements of the enabling legislation for the NCA (Public Law 103-64). Some comments suggested that additional transmission lines are consistent with the law. One comment cited text in Manual 6220 that created the expectation that new transmission lines would not be permitted in an NCA.

The U.S. Environmental Protection Agency (EPA) noted requirements under the Clean Water Act (refer to Section 4.17 below), and the U.S. Army Corps of Engineers cited wetland mitigation requirements. The National Park Service (NPS) requested that the BLM coordinate on analyzing effects on the Oregon National Historic Trail remnants throughout western Idaho, particularly at

intact segments such as those in Hagerman Fossil Beds National Monument and in the vicinity of Three Island Crossing State Park, as well as on alternatives in the vicinity of Hagerman Fossil Beds National Monument.

#### **4.5 OUT OF SCOPE COMMENTS**

Two environmental organizations suggested that the Proponents focus on conservation measures with customers and development of a smart grid. A Melba organization requested being taken off of the Gateway West mailing list. In addition, one organization recommended a cost-benefit analysis be included in the NEPA process. An individual suggested that the all transmission lines be upgraded to 500 kV, recommended using existing rights-of-ways instead of private property, and switching a free market power grid. One environmental organization commented on the South Hills Important Bird Area, which is not crossed by either Segment 8 or 9.

#### **4.6 SUPPORT FOR THE PROJECT AND/OR THE PROPOSED ACTION**

This category received the largest number of comments. More than 150 comments expressed support for the Project and/or the proposed routes, noting that the Proponents had adopted the RAC recommended routes. Most comments noted the need to place the lines on public land where possible. Many comments noted that there were already several transmission lines in the NCA and these had not harmed raptors. However, many of these commenters, while supporting the proposed routes, questioned whether the Proponents' MEP was adequate. Several comments expressed disappointment that the Proponents had not adopted the RAC recommendations on the plan of development.

#### **4.7 OPPOSITION TO THE PROJECT**

Comments from several environmental organizations and individuals opposed the Project due to the Project's effects on wildlife, scenery, historic trails, and other resources. Many of these comments also mentioned the lack of adequate mitigation, both within the NCA and along the entire Project. One comment opposing the Project cited text in Manual 6220 that created the expectation that new transmission lines would not be permitted in an NCA.

Several comments questioned the need for additional transmission lines, and others were opposed to the Project crossing on or near their private land based on the concern that the project would reduce land values in the area. Visual impacts and health and safety concerns were also noted as issues.

#### **4.8 GENERAL COMMENTS ON SEGMENTS 8 AND 9 AND ON OTHER ROUTES**

Several comments generally stated agreement or approval of Segment 8 and/or Segment 9, but did not provide a specific rationale explaining their position on the project. Others had specific comments about particular portions of the new proposed Segments 8 and 9 and/or alternatives for Segments 8 and 9 that were part of the FEIS. These comments are summarized below. If a comment pertained to a specific resource or resource use, it is discussed also under that resource section in this report.

The EPA recommended consistent application of environmental protection measures on both federal and non-federal lands and requested that the SEIS provide updated concerning where the protection measures will apply and on the impacts associated. One commenter suggested using public lands to replace lost farm or private lands from siting of Segments 8 and 9, while another asked about farmers getting a fair price for their land if the line is sited across it.

A letter from two organizations commented that Segment 8 and 9 alternatives (likely referring to the alternatives analyzed in the FEIS) could degrade and fragment large areas of sagebrush ecosystems and other fragile lands. Another commented that greater sage-grouse Priority Habitat should be considered exclusion zones throughout the entire length of the Project. These organizations also raised concerns about impacts to Areas of Critical Environmental Concern. Other comments (including from environmental organizations) suggested that a wide range of routes and/or alternatives must be considered in this analysis. Some specifically recommended that all RAC options be considered in the analysis. Some organizations were concerned about routing Segments 8 and 9 on the NCA and conflicts with other federal policies.

The State of Idaho indicated that the new proposed routes are an improvement over the BLM's preferred alternative in the FEIS. The state supports co-locating Segments 8 and 9 with the existing transmission lines to minimize impacts on agriculture, historic properties, visual resources, and greater sage-grouse. The state also requested full analysis of impacts on several resources if any new alternatives are developed as a result of the SEIS scoping process, particularly any near the Bruneau Dunes State Park or State Endowment Lands and Public Trust Lands.

The NPS expressed concern about portions of the BLM Preferred Alternative from the FEIS in the vicinity of Hagerman Fossil Beds National Monument (see Section 4.16, Recreation). In addition, the NPS expressed concern over placement of Segment 9 between King Hill and the NCA, particularly in regard to the Oregon National Historic Trail. An historic trail organization expressed a concern about impacts to historic trails remnants along Segments 8 and 9 (see section on historic trails).

Many commenters were opposed to the lines being sited on private lands, with many preferring the new proposed Segments 8 and/or 9 over the FEIS Preferred Route for Segment 8. Some landowners were in favor of the avoiding the Kuna area and recommended placing the line south of the Swan Falls area. One landowner opposed Alternative 8C from the FEIS because there would be an additional power line across their land. Several commenters supported all or portions of routes considered in the FEIS to avoid having a new line on or near their property or to avoid impacts to the NCA.

One commenter suggested a new route for Segment 8 that would follow an existing line traveling northwest from Midpoint and following the existing line north of Gooding and King Hill then across federal land to south of Mayfield. Two commenters were opposed to Alternative 9E of the FEIS because of impacts on visual resources and greater sage-grouse, while another was in favor of 9E because it crosses more public land and has fewer impacts to private residences. One commenter specifically opposed any route through the Owyhee foothills and the towns of Oreana, Grandview, and Bruneau.

## **4.9 MITIGATION, ENHANCEMENT, AND MONITORING**

The Idaho Farm Bureau requested that the BLM be directly involved in agreements with landowners regarding mitigation and compensation if impacts to private lands cannot be avoided. Some comments requested that all impacts to private lands be fully compensated for, through levels that are agreed to by the land owners. The NPS suggested that any proposed mitigation be commensurate to the level of project-related impacts on private as well as public lands. One comment suggested that mitigation and enhancement be conducted at the landscape level. Several comments suggested that all mitigation programs be implemented for the life of the Project. Multiple comments stated that the SEIS should demonstrate that the MEP creates a net benefit to the NCA before approval of the right-of-way through this area can be granted. The EPA requested that the SEIS disclose the structure and management of the In-

Lieu-Fee program that would be required to compensate for unavoidable aquatic impacts, as well as justify why an In-Lieu-Fee program would be appropriate mitigation for these impacts. One comment requested that a third-party monitor examine “all actions” taken by the Proponents, including mitigation, and that the Proponents provide some of the funding necessary for this third-party monitor.

Multiple comments stated that the mitigation currently proposed is not adequate to compensate for project-related impacts; including impacts to the resources and values of the NCA. Multiple comments requested that the MEP focus on enhancing raptor populations and habitats, and have less emphasis on non-raptor related issues (e.g., public education or law enforcement). These commenters further requested that the Proponents fully adopt the RAC recommendations regarding the MEP, and suggested that a monitoring and research component be added to the plan.

Owyhee County commented that it is county policy to retain all privately owned land in the tax base, rather than allow it to become public land. Some commenters questioned the applicability of land acquisition as a feasible mitigation option for this project, and requested that the BLM and the Proponents justify its use in the MEP. A few comments questioned the accuracy of the Proponents’ claim that the restoration efforts proposed in MEP will have an 80 percent success rate in cheatgrass-dominated areas, and point out that this is in direct conflict with current science and on-the-ground experiences. One comment questioned the effectiveness of perch deterrents as a feasible mitigation option, whereas other commenters requested that the Project include the addition of new perching and nesting structures as mitigation.

One organization requested that the MEP include an effort by the Proponents to come to an agreement with landowners that would change agricultural practices in the area, ultimately resulting in restoration of disturbed private lands. The Golden Eagle Audubon Society made multiple recommendations for additional mitigation measures that they felt should be included in the MEP, such as a “shooting closure” near the transmission line, protection of remnant native habitats, establishment of a restoration fund managed by the Oversight Committee, and the establishment of vegetation monitoring goals and a monitoring plan. One commenter requested that the cost of habitat restoration in the NCA be based on the Habitat Equivalency Analysis found in the FEIS, and not the methods used in the Proponents’ recent MEP.

## **4.10 LAND USE**

Over a third of the comments in this category were against the lines being on private land. The general concern for private property was that land/home owners were concerned about visual impact, land-value depreciation, and loss of production land or development potential. Almost all of these commenters supported the routes through the NCA rather than the alternatives that traverse more private land. One comment stated that if private land was taken for the utility lines, public land should be opened up for development as compensation. Only one comment specifically stated that the route should not go through the NCA; citing raptors’ and pilots’ needs. The Idaho Farm Bureau commented that the County Planning and Zoning Commission is the entity authorized by state law to approve or reject these types of projects and encourages the BLM to honor state law and avoid legal challenges by coordinating with each county official.

Approximately a third of the comments in this category were regarding how the mandate of the NCA would be adhered to if these lines were allowed, including comments citing the legal requirement for the “protection, maintenance, and enhancement of raptor populations and habitats.” A number of comments stated that the proposed mitigation was inadequate to offset degradation that would result from the Project and/or that statements made regarding potential impacts within the NCA were incorrect or misleading. A comment, submitted for the National

Audubon Society, Prairie Falcon Society, and Western Watersheds, stated that the ongoing threats to the NCA should be addressed because the proposed action would only increase these impacts and that amendments would “significantly downgrade protection for natural resources.” Other comments challenged statements made regarding level of impact and needed mitigation, stating that the Proponents downplayed the impacts and provided an insufficient final mitigation package despite earlier comments.

A few comments were received regarding land-use conflicts for public land other than the NCA. One comment raised concerns about the impact the powerlines would have on Celebration Park, regarding changing the viewshed to an industrial landscape. Another comment specifically stated that the “BLM must fully analyze any impacts to Endowment Lands and Public Trust Lands, including beds of navigable lakes and streams.” Another comment stated concerns for how the lines will traverse federal, state, and private lands and how potential conflicts with existing management plans will be addressed.

#### **4.11 WILDLIFE, WILDLIFE HABITAT, AND VEGETATION**

Most comments expressed support for the proposed route because they believed that other route options would have greater impacts to biological resources (including sage-grouse and their habitats, raptor species, pygmy rabbits, burrowing owls, slickspot peppergrass, mule deer, antelope, mountain sheep, and wild horses). The Idaho Department of Fish and Game also expressed support for the portions of Segments 8 and 9 that are co-located with existing infrastructure because these routes would minimize fragmentation of wildlife habitats. However, the State of Idaho emphasized the importance of analyzing any new biological information that has become available since the publication of the FEIS.

Many commenters expressed concern that the Project could impact wildlife and their habitats. Potential impacts that were raised in these comments include fragmentation of habitats, increased human access to previously inaccessible wildlife habitats, increased avian collision risks and subsequent mortality, increased predation of small animals by ravens and raptors, and the effects of noxious weeds and/or fire on wildlife habitats. However, other commenters suggested that the Project would be beneficial to raptor populations, due to the increase in new perching structures resulting from the towers. One commenter expressed concern that the project could impact the South Hills Important Bird Area (IBA); however, the IBA is not in the area crossed by Segments 8 and 9. Topics that commenters want included in the SEIS wildlife assessment include migration corridors, existing population stressors, and any new data and studies that have recently become available.

Multiple comments requested that the Proponents’ MEP focus on enhancing raptor populations and habitats, and have less emphasis on non-raptor related issues (e.g., public education or law enforcement); these comments further requested that the Proponents fully adopt the RAC recommendations regarding the MEP, and suggested that a monitoring and research component be added to the plan. Some comments questioned the accuracy of the Proponents’ claim that the restoration efforts proposed in MEP will have an 80 percent success rate in restoring native vegetation to cheatgrass-dominated areas, and point out that this is in direct conflict with current science and on-the-ground experiences. One comment questioned the effectiveness of perch deterrents as a feasible mitigation option. Other commenters requested that the Project include the addition of new perching and nesting structures (beyond the towers) as mitigation.



## 4.12 SCENERY AND VISUAL RESOURCES

Visual resource concerns within the NCA were raised by multiple commenters. Comments mentioned decreased visual values as a result of placing the Project within the NCA, while one comment specifically stated that amendments would result in degradation of the NCA resources. Two comments specifically supported routes going through the NCA, stating that these routes allow for minimization of visual impacts in the area.

There were some comments regarding visual impacts of the Project to historic trails. Two comments approved routing that minimized impacts to historic trails (from Glenns Ferry to Indian Springs, and routing north or east of the Snake River), while one comment specified desired methods for addressing trail crossings (cross in already degraded areas, do not put lines in pristine trail viewsheds).

The most frequently voiced concern regarding visual effects was views from private land and how the addition of the Project to these views would result in a depreciation of land value. Additionally, multiple comments were submitted regarding Alternative 9E from the FEIS and how it would have irreversible impacts on the pristine character of the Owyhee Front. These comments supported choosing a route that did not impact the Owyhee Front. There were also comments concerned with the effects of routing lines near public parks, specifically the Bruneau Sand Dunes (night sky viewing), Celebration Park, and Hagerman Fossil Beds. The NPS specifically stated support for the BLM alternative near Hagerman Fossil Beds National Monument and that if routes closer to this area are considered, there may be concerns related to visual resources, among other resource issues. One comment raised concerns over creating an industrial landscape viewable from Celebration Park, which is a well-used recreation area.

## 4.13 CULTURAL RESOURCES AND HISTORIC TRAILS

Most comments expressed support for the proposed route along Segments 8 and 9, and opposed other route options due to the possibility of increased impacts to cultural resources that could occur if the route crossed private lands. One commenter expressed support for the proposed route because it would avoid impacts to the "Historic Old Oregon Trail." Multiple comments requested that appropriate mitigation be applied to compensate for impacts to trails and cultural resources if impacts could not be otherwise avoided.

One commenter expressed concern that there might be Native American sites along Owyhee front in the Oreana area that have not been considered in previous analyses for this Project; while one comment requested that the SEIS provide a map of cultural resources that would be impacted by the Project.

One comment pointed out that the BLM needs to show that the selected route complies with the requirements of the enabling legislation for the NCA (Public Law 103-64), including the requirement to maintain cultural resources and values of the area. One commenter requested that the Project cross the Oregon and California National Historic Trails in areas that are already disturbed or where no trail remnant exists. The Idaho Chapter of Oregon-California Trail Association expressed support for the "Gateway West Programmatic Statement for historic preservation," the "Cultural Resources Protection Plan," and the off-site mitigation projects proposed by the Proponents to compensate for unavoidable impacts to historic and archeological resources. The NPS requested that the BLM continue to protect the visitor experience at the Oregon National Historic Trail, and that any proposed mitigation be commensurate to the Project's impacts. The NPS stated that the Oregon National Historic Trail could be impacted by the BLM Preferred Route from the FEIS as well as the currently proposed route for Segment 8. The NPS further requested the BLM provide them with a data layer for the

Project so that they could determine the location of the proposed crossing of the Oregon National Historic Trail along Segment 9.

#### **4.14 SOCIOECONOMIC ISSUES**

Most comments expressed support for the proposed route along Segments 8 and 9, and opposed other route options due to the possibility of increased impacts to agricultural areas if the route crossed private lands. However, one commenter requested that the route not cross the Snake River Birds of Prey NCA or the National Guard's base, because they felt that potential impacts to the military base and the NCA would be greater than what would be experienced by the farming community on private lands. Some comments expressed concern that routing the Project through agricultural areas would prevent future developments of pivot agriculture in the area, while other commenters expressed concern regarding how the Project could affect future economic development and immigration into the area. The Idaho Farm Bureau requested that private properties be avoided to the extent possible, and that direct involvement and agreement with the landowner regarding the route and mitigation/compensation would be needed if impacts to private lands could not be avoided. The Idaho Farm Bureau further stated that the BLM should closely coordinate with each county's official elected representative regarding the Project's alignment, because they are the entity authorized by state law to provide the final alignment approval. Some comments requested that the SEIS assess the economic benefits and costs of routing the Project through the Snake River Birds of Prey NCA compared to a route that crossed private lands. One commenter requested that the cost of habitat restoration in the NCA be based on the HEA analysis found in the FEIS, and not the methods used in the Proponents' recent MEP. One commenter suggested that funds proposed in the MEP for education and land acquisition should instead be used for "more effective enhancement projects." However, one commenter suggested that the Project could have positive impacts on economic growth in the area, due to increased access to reliable power. Multiple comments expressed concern that the Project would adversely affect adjacent property values.

#### **4.15 AGRICULTURE**

Most of the comments focused on concerns that routing the Project through agricultural areas would adversely affect farming practices. Potential impacts raised by commenters included: the possibility that the line would prevent future developments of pivot agriculture, potential adverse effects that the Project's electric and magnetic field (EMF) could have on sensitive farm and dairy equipment, and the potential effects of the EMF on cattle health and production. One commenter described the effects that a transmission line EMF had on his farm in California, which included a reduction in the milk production of his cattle.

#### **4.16 RECREATION**

The State of Idaho requested full analysis of impacts on wildlife recreation activities that were not previously analyzed during the FEIS process. The state also requested analysis of all recreational opportunities, including night sky viewing, if any alternatives are routed near the Bruneau Dunes State Park. One commenter was concerned about a second transmission line in close proximity to Celebration Park, particularly because of frequent park visitation by large groups. Another individual indicated that Celebration Park and Guffey Bridge do not appear to have many impacts. A local Kuna individual expressed concern about a transmission line interrupting various recreation opportunities on BLM land south of Kuna, such as hiking, cross country running, biking, four-wheeling.

The NPS recommends the BLM Preferred Alternatives in the vicinity of Hagerman Fossil Beds National Monument (the Monument). Other routes could impact visual resources and visitor access during construction and cause increased vandalism and theft of resources from off-highway vehicles (OHV) and horseback use on new access roads. If new alternatives are developed in proximity to the Monument, NPS requests early interagency coordination. NPS is also concerned about protecting the visitor experience at Oregon National Historic Trail remnants, particularly in the Monument, in vicinity of Three Island Crossing State Park, and other public and private lands.

Several organizations pointed out that new roads and increased access by the public will degrade areas that were not previously as accessible. These organizations shared current scientific literature to be utilized when developing alternatives and minimizing harm to recreational uses. One commenter pointed out that increased public access on the NCA will increase vandalism, weed spread, litter, and recreational shooting. The commenter requested either the BLM close the roads to recreational shooting or the Proponents fund studies of the effects of recreational shooting, including lead, on raptor and prey populations.

#### **4.17 WATER RESOURCES AND USE**

The EPA requested that the EIS disclose the structure and management of the In-Lieu-Fee program that would be required to compensate for unavoidable aquatic impacts, as well as why an In-Lieu-Fee program would be appropriate mitigation for these impacts. One comment recommended that the SEIS analyses the impacts that the Project would have on Endowment Lands and Public Trust Lands, including navigable waters. Some comments voiced the public's concern regarding the potential impacts to water resources along Segment 8, from MP 126 to the Hemingway Substation.

#### **4.18 AIR QUALITY AND GREENHOUSE GAS**

One comment was received concerning air quality. The Prairie Falcon Association and Western Watersheds Project stated that they would like an analysis of the Project's effects on climate change in the Draft SEIS; assessing any "adverse impacts that may result from Gateway and degradation and risks it poses."

#### **4.19 TRANSPORTATION**

Multiple comments mentioned the potential impacts that increased access (as a result of new road building) would have on the NCA, including weed spread, vandalism, litter, and recreational use. Comments raised concerns over additional impacts to the NCA, including the risk of raptor electrocutions, damage to slickspot peppergrass, increased weed infestations, and increased fire risk. One comment requested questioned how the alternatives correspond to the latest BLM Idaho Infrastructure map.

Other comments supported the proposed placement of the lines in the NCA because it contains an existing infrastructure and minimizes new road construction. One comment noted that this route would be easier to build because it avoids some canyon traverses and roadways, and maintenance and upkeep would be easier than other alternatives. One comment suggested conducting a study evaluating the cost savings of using the existing roads on these new routes and adjusting the enhancement package accordingly.

There were several comments regarding effects of the line in areas other than the NCA. The NPS commented that if the route near the Hagerman Fossil Beds National Monument was moved closer to the Monument, increased access could pose vandalism, theft, and OHV risks to

the area. One comment expressed a concern that the proposed route would impact development plans, such as airport construction because the line placement would make taking off and landing impossible.

#### **4.20 GEOLOGIC HAZARDS, SAFETY, AND ELECTRICAL ENVIRONMENT**

Some comments expressed concern about health, safety, and noise issues for people living close to high-voltage transmission lines, particularly in areas where transmission lines already exist. Several organizations were concerned that the Project would increase fire danger, particularly from new roads and increased access to the area and from raptor electrocutions that fall to the ground. One commenter pointed to easier construction and maintenance of the Project, including tower installation and road building, in areas with fewer canyons and undulating terrain. Another commenter cautioned of potential safety issues from the line and proximity to the Murphy Airport.

Dairy operators expressed concerns about impacts to dairy operations including milk quality, reduction in milk production, dairy cow behavior, feeding, and conception rates. One dairy operator was worried about having to monitor these concerns and the sensitive milk barn equipment and electronics that could be affected from the transmission lines. Others were concerned that the Project would interfere with radio and television reception and transmission. One comment questioned the long-term effects of power lines on raptors.

#### **4.21 EFFECTS ON THE STATE AND COUNTIES**

Two comments mentioned the cooperation between federal, state, and local officials and groups in designing these alternatives and stated that there is no reason to choose any other route and to keep the lines in the NCA. One comment stated that impacts to State Endowment Lands and Public Trust Lands (including navigable lakes and streams) should be fully analyzed. One comment addressed the purchase of private lands to mitigate impacts to cultural resources, stating that this would be contrary to county goals of keeping current acreage in private ownership (citing effects to the tax base). One commenter mentioned use of the BLM land south of Kuna, and how this area is highly used and the lines should be moved to an area with less community use.

#### **4.22 CUMULATIVE EFFECTS**

Comments requested the SEIS address cumulative impacts of multiple power lines, energy developments and other disturbances on native vegetation and greater sage-grouse migration and movement.

**APPENDIX A**  
**ISSUES IDENTIFIED IN THE 2009 SCOPING PROCESS**

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## **Issues from the 2013 FEIS Applicable to Segments 8 and 9**

Some of the issues raised in scoping dealt with the effects of the Project and what should be included in the analysis. These issues, summarized below, are detailed in Chapter 3 sections on affected environment, direct and indirect effects, in Chapter 4 on cumulative effects analysis for each resource, and in Chapter 5 on consultation.

### **Visual Resources**

- Would an inventory of all potentially affected viewsheds be carried out?
- Could the transmission line be located where it is not visible from residences?
- Do the visual effects conform to Visual Resource Management or Visual/Scenic Quality Objectives established in land use plans?
- How would visual effects conform to goals in RMPs and Forest Plans?
- Would increased public access degrade visually sensitive areas?
- How would sensitive viewing areas be affected?
- Would the effects on visuals interfere with the public's enjoyment of the site?
- Would public views be obstructed?
- What would visual impacts of construction be on natural formations such as mountains?
- How would impacts on visual resources affect income from tourism?
- What would be the effects on light pollution at night?
- What would be the impact on designated areas of scenic importance, such as Scenic Byways?
- How would visual effects be mitigated?

### **Cultural Resources**

- What values do the area's Native American communities ascribe to places of historic and traditional significance?
- Would all impacted Native American tribes be consulted?
- What would be the impact on Native American Tribes and would their treaty rights and privileges be addressed?
- Would a complete inventory of potentially impacted cultural sites be carried out?
- Would the design of structures such as towers and substations minimize their visual impact to the setting of historic properties?
- What are the impacts on eligible prehistoric resources?
- What are the impacts on eligible historic resources?
- What would be the visual and recreational impacts on historic trails?
- Would TCPs be affected?
- Where the setting is an important aspect of the integrity of a property, would the setting be affected?

## **Socioeconomics**

- Is there sufficient housing available for temporary and permanent workers?
- Would the temporary workforce have detrimental effects on existing services in local municipalities?
- What would be the effects on population numbers?
- What would be the effects on economic conditions?
- Would education or schools be affected?
- Would public services such as police or fire protection be impacted?
- How would the Project affect tax income to local governments?
- How would development of the Project impact municipal infrastructure and other planned development?
- How would the presence of the transmission line affect the quality of life of and enjoyment of the land by local residents?
- What would be the economic impacts to individuals?
- How would this Project affect tourism and recreation?
- Would construction or operations of the Project disrupt delivery of any public utilities such as electricity or sewer?
- What municipalities and other population concentrations would be impacted?
- Under what circumstances would private land be condemned, and what would the effects of this be?

## **Environmental Justice**

- What would be the effects on minority populations or communities?
- What would be the effects on low income populations or communities?
- What would be the effects on Tribes?

## **Vegetation Communities**

- How much vegetation would be cleared, and how much would be kept clear or otherwise maintained during operations?
- How quickly would the various vegetation communities that are cleared for construction but allowed to regrow during operations recover from disturbance?
- How much disturbance would occur in sagebrush communities and what would be the effects?
- How much disturbance would occur in native grasslands and what would be the effects?
- Would old-growth forest stands be affected, and what measures would be taken to protect this vegetation type?
- What would be the effects of construction, operations, and maintenance on fire occurrence, frequency, and severity; especially as they relate to important shrub-steppe and forest habitats?

### **Special Status Plants**

What would be the effects to endangered and threatened species, both individuals and populations?

What would be the effects from changes in habitat for TES plants?

What effect would the potential spread of noxious weeds have on special status plants?

Would hydrology be altered in occupied habitat for TES species associated with wetlands and what effect would the alteration have on those species?

### **Invasive Plant Species**

Would noxious weeds be introduced or spread into the ROW and adjacent areas?

How would the presence of the Project impact efforts to control existing noxious weeds?

Would a noxious weed prevention and abatement plan be developed in conjunction with the appropriate agencies?

### **Wetlands**

What would be the effects on permanent and seasonal wetlands?

Would riparian areas be affected?

Can equipment staging and/or refueling areas be kept away from wetlands and riparian areas?

### **General Wildlife and Fish**

What would the effects of Project construction and operations be on general, non-special-status wildlife, including birds, reptiles and amphibians, and large and small mammals?

When routing the Project, would key wildlife habitats be avoided?

What would the effects be on migratory bird species?

Would there be a loss or fragmentation of wildlife habitat, especially for sagebrush-obligate and forest-dependent species?

What wildlife mortality would occur during construction?

Would there be a potential for disruption of breeding and reproductive activities of raptors?

What would be the effects on big game migration?

What would be the effects on big game and crucial big game winter range—habitat removal and disturbance during seasonal occupancy?

What would be the effects on big game parturition areas from habitat removal and disturbance during seasonal occupancy?

What would be the potential for avian collision during operations and what measures would be taken to minimize this risk?

Would noise created during transmission line operations affect wildlife?

What best management practices would be used during construction and operations to protect fish resources?

How would disturbed instream habitats be protected and restored?

What would be the potential for electrocution of large birds during operations?

What would be the impacts on wildlife or wildlife habitat within an NWR, State Park, State Wildlife Management Area, or Special Management Area on federal lands specifically managed for one or more species of wildlife?

### **Special Status Wildlife and Fish Species**

What would be the effects of Project activities on species federally listed as threatened, endangered, candidate, or proposed?

How would Project construction and operations affect predation on sage-grouse and sharp-tailed grouse, and how would these risks be minimized?

How would the Project affect sage-grouse and sharp-tailed grouse habitat?

Would the Project comply with sage-grouse and sharp-tailed grouse Conservation Plans?

What agencies and conservation groups would be consulted?

What would be the impacts on nesting and wintering eagles and their habitat?

What would be the effects on species listed as sensitive by the BLM? Specifically, what would be the impacts to greater sage-grouse breeding and brood rearing areas and where would these impacts occur?

What would be the effects on species listed as sensitive by the Forest Service?

### **Minerals**

#### **Paleontological Resources**

Would a full inventory of potentially affected paleontological resources be carried out?

Would fossils be damaged during construction?

Would fossils be removed or destroyed by increased access to protected areas?

#### **Geologic Hazards**

Would a full inventory of potentially affected geological resources be carried out?

What would be the potential for earthquakes to damage the transmission line and associated structures?

What effect would subsidence from underground mining have on the transmission line, and what would be the hazard to workers or infrastructure?

What effect would landslides have on the transmission line?

What effect would construction blasting in shallow bedrock have on unstable landforms (landslide-prone areas) or on adjacent man-made structures not related to the transmission line?

## **Soils**

What would be the effect on soil erosion, and the potential for increased soil erosion from Project construction, operations, and decommissioning?

What would be the effect on Project soils from compaction by vehicle and equipment traffic?

What effect would topsoil disturbance have on soil productivity after construction and reclamation?

## **Water Resources**

What would be the impacts to water quality from roads and other causes of erosion?

Would state water quality standards be met?

Which pollutants could enter waterbodies and what would be the impacts from them?

What would be the impacts on drinking water, wells, and springs?

Would municipal water service to individual properties be affected?

What would be the handling procedures for hazardous materials near waterbodies and wells?

Would water be drawn from surface waterbodies, and what would the effects of that be?

What storm water permits would be required, and would their stipulations be met?

Would there be any impacts on water rights?

What would be the impacts from sedimentation and temperature increases in sediment and temperature-impaired water bodies?

Would groundwater be affected?

## **Land Use and Recreation**

How would the project affect concentrated animal feeding operations (CAFO)?

How would the project affect current agricultural systems, including pivot irrigation and advanced positioning systems used in farm equipment?

What residential areas, planned development, and specially designated uses would be affected?

How would the Project affect specially designated areas including NWRs, National Parks, National Monuments, Special Management Areas, and recreation sites, and roadless areas?

How would the transmission line affect timber and fire management activities?

To what extent would the Project be co-located with existing developments?

Would hunting or fishing be affected?

Would there be any losses of recreational opportunities?

Would the Project adhere to local land use plans and policies?

Would the Project impact any military activities?



How would construction of this transmission line influence the installation of more developments and projects in the same area in the future?

Would construction buffers around buildings be maintained?

What permits and plan amendments would be required for this project?

What would be the plan for re-entries and maintenance activities on private land which would continue for decades into the future?

### **Agriculture**

How much agricultural land would be impacted, and what would the effects be?

What would be the effects on livestock grazing of construction and operations of the transmission line?

Would there be a loss of prime farmland?

What would be the impacts to agricultural production including equipment operation and aerial spraying?

Would there be a disruption to dairy operations and other types of CAFOs?

How would the transmission line interfere with crop dusting?

Would the transmission line cause electronic interference with agricultural equipment?

### **Transportation**

Would a full map and inventory of all new temporary and permanent access roads for the Project be developed?

How would vehicles taking materials and personnel to and from the Project site affect traffic patterns?

How would roads, highways, railroads, and airports be affected?

Would there be an increase in off-highway vehicle use, and what would be the environmental impacts of this?

Would construction and operations of the Project cut off access to any previously-accessible areas?

- How would roads affect livestock and grazing operations?
- What would be the environmental effects of new temporary and permanent roads constructed for this Project?

### **Air Quality**

Would the proposed Project be inconsistent with the applicable air quality plans?

What would be the effects on human health of any increase in airborne pollutants caused by the Project?

Would the proposed Project generate emissions of air pollutants that would exceed established thresholds, or cause adverse impacts on air quality?

Would the proposed Project cause or contribute to any violation of any state or federal ambient air quality standards?

Would the proposed Project expose sensitive receptors to substantial pollutant concentrations?

What would be the methods used to control dust?

What would be the steps taken to minimize air quality impacts?

How much greenhouse gas emissions would be associated with this project, and what would be the effect of the Project on climate change?

### **Electrical Environment**

Would voltage on the conductors of the transmission lines build up, for example in large vehicles or pivot irrigation systems, and produce nuisance shocks, or lead to fuel ignition?

Would electric and magnetic fields (EMF) associated with transmission lines cause health effects?

Would the audible noise during operations be loud enough to be annoying or interfere with normal communication?

Would stray voltage be a concern in the context of animal care where unwanted voltage on feeders, watering stations, or equipment such as milking machines, can lead to reduced food or water intake.

Would services such as Global Positioning System (GPS) receivers, satellite dish receivers, cell phones, AM/FM (amplitude modulation/frequency modulation) radio, two-way radio communication, television, and internet be disrupted?

### **Public Safety**

Would the Project cause environmental contamination or expose workers or the public to contamination?

What would be the effects of electric and magnetic fields?

Would the transmission line withstand wind and ice storms?

Would the transmission line cause fires or create a fire hazard?

Would workers or the public be safe from electrocution?

What would be the effects of the transmission line on human health?

What would the Proponents do to prevent the dangers of downed lines and tower failure?

How would the Proponents protect against potential vandalism or acts of terrorism to Project structures?

Would electrical safety procedures be followed?

### **Noise**

Would people be exposed to noise levels in excess of standards established by existing regulations, ordinances, and standards?

Would there be a substantial temporary or permanent increase in ambient noise levels in the Project vicinity above levels existing prior to Project construction and operation?

Would people be exposed to ground-borne vibration or ground-borne noise levels?

**APPENDIX B**  
**COMMENT CODES AND TABLE**

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**Appendix B-1**  
**Codes Developed for the SEIS Scoping Report**

## Gateway West Segments 8 and 9 Scoping Comment Categories

Updated 11/12/2014 – DRAFT

Code	Subject	Notes
<b>10000</b>	Conformance with the NEPA process	Includes comments on the need for a new EIS vs. SEIS and what an SEIS should consider
<b>10010</b>	Out of scope comments	
<b>11000</b>	Purpose and Need for the Project	
<b>12000</b>	Relationships to other federal laws and policies	Specific comments on land management plans/plan amendments go under 34030
<b>13000</b>	Use of/ Failure to use designated corridors	RMP corridors in NCA or WWEC
<b>14000</b>	Proposed Action	Includes revised routes and MEP
<b>15000</b>	Comparison of Alternatives	
<b>16000</b>	Generally support project	Specific comments on proposed route go under Segment Reference (50000 series)
<b>17000</b>	Generally oppose project	Specific comments on proposed route go under Segment Reference (50000 series)
<b>18000</b>	Comments on segments 1 to 7 & 10	These are out of scope but we need to track them separately
<b>19000</b>	Mitigation (general)	See 35000 if mitigation specific to the MEP or NCA
<b>20000</b>	Monitoring	
<b>21000</b>	Tribal Consultation/ Treaty Rights and Resources	
<b>22000</b>	General Environmental Resources	Use visual if unsure between visual/historic trails
<b>23000</b>	Visual Resources	
<b>24000</b>	Cultural Resources	
<b>24010</b>	Historic Trails	
<b>25000</b>	Socioeconomics	Tourism
<b>25010</b>	Employment	
<b>25020</b>	Housing	Includes constraints during construction and shortage
<b>25030</b>	Property Values	
<b>25040</b>	Taxes/Taxpayers	
<b>25050</b>	Community/city development and expansion	Includes economic effects on new subdivisions and facilities (also see 34020)
<b>25060</b>	Agriculture	Economic effects on farming, including irrigation systems (technical impacts due to tower and line placement are under 37000)
<b>26000</b>	Environmental Justice	Includes minority and disadvantaged communities
<b>27000</b>	Vegetation	
<b>27010</b>	Special Status Plants	Mostly comments on slickspot peppergrass
<b>27020</b>	Invasive Plants/weeds	



# Gateway West Segments 8 and 9 Scoping Comment Categories

Updated 11/12/2014 – DRAFT

Code	Subject	Notes
27030	Wetlands / Riparian vegetation	
27040	Native vegetation	Includes restoring sagebrush and native grasses
28000	Wildlife (general)	
28010	Habitat Fragmentation	
28020	Raptors/Eagles/Ravens	
28030	Big Game/Winter Range	
28040	Migratory Birds	
28050	Fish	
28060	Other Special Status Wildlife	
28070	Sage-grouse	
28080	Threatened / Endangered Species	Includes T&E, ESA, TES, listed species, candidate species, proposed species
29000	Minerals/Mining	
30000	Paleontology	fossils
31000	Geologic Hazards	Includes risks from earthquakes, landslides, unstable areas
32000	Soils	Includes erosion, compaction, loss of fertility
33000	Water Resources and Use	
34000	Land Use	
34010	Private Land/Land Ownership	General comments
34011	Site the line on public land	Avoid private land
34012	Site the line on private land	Avoid public land/avoid the NCA
34020	County and City Plans/Zoning	Municipal Impact Areas
34030	Federal land Use Plans/	Includes Plan Amendments
34040	Wilderness/Wild and Scenic Rivers	
35000	NCA/SRBOP (general)	
35010	Enhancement requirements	General comments
35020	Mitigation suggestions	General
35030	Applicants' MEP (specific to NCA)	
35040	Recommendations for MEP changes	Includes applying MEP to areas outside NCA
36000	Recreation	
36010	Trails	Other than historic trail issues
36020	Off Road Vehicles/OHV	Includes comments on non-motorized areas
37000	Agriculture (includes crop production, dairies, cattle feedlots, and grazing)	Technical issues such as interference with pivot irrigation
38000	Transportation	Includes impacts to traffic, new road construction
39000	Air Quality	

## Gateway West Segments 8 and 9 Scoping Comment Categories

Updated 11/12/2014 – DRAFT

Code	Subject	Notes
<b>40000</b>	Electrical Environment	Includes electric magnetic interference (EMI) and electromagnetic fields (EMFs)
<b>41000</b>	Public Safety	Specific comments on health risks from transmission lines/EMFs, construction accidents
<b>42000</b>	Noise	
<b>43000</b>	Cumulative Effects	
<b>44000</b>	Consultation	
<b>45000</b>	Literature Used/Not Used	
<b>46000</b>	Refers to Previously Submitted Comments	
<b>47000</b>	Plan of Development (POD)	Either the revised POD or the 2013 POD (comments on Companies' MEP go under 35030)
<b>48000</b>	Design Features	Use this for any suggestions on double circuiting, separation distance, tower type, placing the line underground, etc.
<b>Geographic/Segment Reference</b>		
<b>50000</b>	Segment 8 – General	
<b>50010</b>	Segment 8 – Applicants' Proposed Route	
<b>50020</b>	Segment 8 – Routes considered in the 2013 FEIS	
<b>50030</b>	Segment 8 – RAC Route Options	
<b>51000</b>	Segment 9 – General	
<b>51010</b>	Segment 9 – Applicants' Proposed Route	
<b>51020</b>	Segment 9 – Routes considered in the 2013 FEIS	
<b>51030</b>	Segment 9 – RAC Route Options	
<b>57000</b>	General project effects on Counties	
<b>58000</b>	General project effects on State (Idaho)	

## **Appendix B-2 Comment Table**

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101396	1	1	MICHAEL KERSHNER	I = Individual (s) not affiliated	QC complete	I would suggest that the options that run south of Melba are the best fit for all involved.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101401	1	1	JAMES AND MARY FREELAND	I = Individual (s) not affiliated	QC complete	The newest rout options for area 8 close to the existing power lines in the birds of pray area is Ok. Power lines should not run across the Melba valley area north or south.	50010 - Segment 8 – Applicants’ Proposed Route
101397	1	1	ARLENE TRIPLETT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other route and I approve the proposed Segment 8 route that the Regional Advisory Com (RAC) has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101395	1	1	SIDNEY SWAILS	I = Individual (s) not affiliated	QC complete	I approve The Segment 8 Route That the RAC has proposed. The NAC approved this and I see no other resone to spend any more money on this this has been the best possible route that has been vetted.	50010 - Segment 8 – Applicants’ Proposed Route
101394	1	1	PATTI CAMERON	I = Individual (s) not affiliated	QC complete	we are happy to endorse Segment 8 &9, Idaho Power & Rocky Mt proposed route. Section 8 - Summer Lake option one Section 9 - Baja RD - Murphy Flats South. We oppose all other options, due to impacts on private land, such as ours, agricultural, economy sage grouse & sage grouse habitat. The tower infra structure are already in place, in the Birds of Prey what a great place for Gateway West Transmission Line!	25000 - Socioeconomics, 25060 - Agriculture, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route, 48000 - Design Features
101392	1	2	US FISH AND WILDLIFE SERVICE, WYOMING ECOLOGICAL SERVICES,US FISH AND WILDLIFE SERVICE, IDAHO FISH AND WILDLIFE OFFICE,MICHAEL CARRIER	G = Government	QC complete	The Idaho Fish and Wildlife Office (IFWO) supports updated alternatives for Segments 8 and 9 that co-locate proposed new facilities with existing transmission lines to minimize fragmentation of habitats, including sagebrush steppe habitat. In addition, we encourage the Bureau and Project proponents to continue to work collaboratively with others to ensure that the final plan for updated Segments 8 and 9 provides meaningful and sufficient mitigation of impacts as well as net benefits to wildlife, native plants, and their habitats. The IFWO is available to provide technical assistance in the mitigation planning process for this Project as it pertains to our agency's trust resources.	19000 - Mitigation (general), 27040 - Native vegetation, 28000 - Wildlife (general), 28010 - Habitat Fragmentation, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route, 48000 - Design Features
101392	2	2	US FISH AND WILDLIFE SERVICE, WYOMING ECOLOGICAL SERVICES,US FISH AND WILDLIFE SERVICE, IDAHO FISH AND WILDLIFE OFFICE,MICHAEL CARRIER	G = Government	QC complete	The IFWO is in the process of scheduling a meeting with the Bureau's Idaho State Office natural resources staff to discuss any additional Endangered Species Act section 7 needs for the updated Segment 8 and 9 transmission line routes. We also will discuss the updated proposed locations of the transmission line segments in relation to existing wildlife projects. As additional details about the updated transmission line routes become available, we will provide more detailed input to the Bureau.	27010 - Special Status Plants, 28080 - Threatened/Endangered Species
101375	1	1	JOSEPH AMOS JR	I = Individual (s) not affiliated	QC complete	I approve the segment 8 route. Please do not change the route from the NCA	50010 - Segment 8 – Applicants’ Proposed Route
101377	1	2	KENNETH BLEVINS,NORMA HUTCHINS BLEVINS	I = Individual (s) not affiliated	QC complete	8 or 9 route is O.K. with us	50000 - Segment 8 General, 51000 - Segment 9 – General
101379	1	1	GEORGE KARAGIANES	I = Individual (s) not affiliated	QC complete	I prefer the proposed route. I approve it because it is further from the land I own. It is 1,200 acres in Black Creek Area. The deffered decision is much to close to my property.	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101372	2	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	The Idaho Farm Bureau is encouraging you to place this line as much as possible on BLM lands and only to the extent absolutely necessary on private property. It only makes sense to avoid impact that would be caused to tillable or irrigated agricultural operations. If private production lands are deemed to be the only option possible, then involvement and agreement with landowners must conducted to minimize the impact to farming activities. Obviously, reasonable compensation for land values and mitigation of impact to private property must be guaranteed.	19000 - Mitigation (general), 25060 - Agriculture, 34010 - Private Land/Land Ownership, 34011 - Site the line on public land
101372	3	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	We support the Regional Advisory Commission recommendation and the proposed routes developed through the Snake River Birds of Prey (SRBOP) for both Segments 8 and 9. These routes have the lease impact on the least number of people, resources, agriculture, residences, wildlife, scenic and cultural values.	23000 - Visual Resources, 24000 - Cultural Resources, 25020 - Housing, 28000 - Wildlife (general), 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route

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101372	4	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	The Idaho Farm Bureau supports and believes that County Planning and Zoning Commissions under the authority of respective County Commissions is the entity authorized by state law to provide the final alignment approval and is authorized to permit or reject construction projects of this nature. We encourage the BLM to honor and follow the provisions of Idaho state law. To avoid legal and (Cont'd . . . ) jurisdictional problems we encourage your close coordination with each county's officials elected to represent their citizens on this important and expansive project. It is our position that this will be beneficial for the development of an appropriate alignment, minimize legal challenges and ultimately reduce the costs that will ultimately be passed on to the utility customers.	25000 - Socioeconomics, 34020 - County and City Plans/Zoning
101372	1	1	IDAHO FARM BUREAU FEDERATION,FRANK PRIESTLEY	S = Special Interest Group	QC complete	Many of our members live in close proximity to the proposed segments 8 and 9 and have concern regarding the impact to their agricultural property and property values from the alignment of this transmission line.	25030 - Property Values
101374	1	1	LYNN HEINER	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101382	1	0	ANONYMOUS	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101340	1	1	KRIS KALANGES	I = Individual (s) not affiliated	QC complete	I strongly urge you to approve the Original Se. 8 route that would NOT go through the Morley Birds of Prey NCA nor the National Guard Range. The farmers don't need protections. The Birds of Prey The military pilots do need to have the towers & power lines kept out of the respective areas.	25060 - Agriculture, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 50020 - Segment 8 – Routes considered in the 2013 FEIS
101338	1	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The OER supports the Proponents' Proposed and RAC recommended route for Segment 8 of the Project. This route beneficially co-locates with existing transmission infrastructure in the SRBOP-CA, which minimizes impacts on the SRBOP-NCA. Additionally, this is an improvement over BLM's preferred alternative in the Final Environmental Impact Statement (FEIS).	16000 - Generally support project, 35000 - NCA/SRBOP (general), 50010 - Segment 8 – Applicants’ Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101338	2	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The Proponent Proposed Route for Segment 8 minimizes impacts to agricultural operations, existing residences, future residential development, and economic impacts to the cities of Kuna and Melba.	25000 - Socioeconomics, 25050 - Community/city development and expansion, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 34020 - County and City Plans/Zoning
101338	3	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The OER also supports the Proponents' Proposed and RAC recommended route for Segment 9 of the Project. This route will minimize impacts on the SRBOP-NCA by utilizing the same transmission towers to accommodate the existing 138 kV and the new 500 kV lines in a double-circuit configuration. Because this route will be built along the existing right-of-way adjacent to Big Baja Road, there will be no need to create new roads, which will also minimize impacts. The Proponents' Proposed route improves on BLM's preferred alternative in the FEIS because it minimizes impacts on agriculture, historic properties, and moves the linear infrastructure development out of the largely untouched, green-field landscapes of the Owyhee Front. Additionally, this route avoids Greater Sage-Grouse habitat, and was unanimously accepted by stakeholders including the Owyhee County Task Force and the Owyhee County Commissioners.	23000 - Visual Resources, 24000 - Cultural Resources, 25060 - Agriculture, 28070 - Sage-grouse, 35000 - NCA/SRBOP (general), 38000 - Transportation, 51010 - Segment 9 – Applicants’ Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS, 48000 - Design Features
101338	4	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	The OER and the State of Idaho believe that any analysis that BLM does should not be duplicative of the work done in the FEIS and must be limited to new routes developed in the Scoping process.	10000 - Conformance with the NEPA process
101338	5	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	BLM must fully analyze any impacts on fish and wildlife, including wildlife recreation activities, that have not previously been analyzed in the FEIS or any other environmental analysis that has been done in association with this project.	28000 - Wildlife (general), 28050 - Fish, 36000 - Recreation



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101338	6	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	If BLM, through the scoping process, develops alternative routes near the Bruneau Dunes State Park, the routes must be analyzed for their impacts on all of the recreational opportunities offered by the park including viewing the night sky from the Observatory.	23000 - Visual Resources, 36000 - Recreation, 51000 - Segment 9 – General
101338	7	1	STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,JOHN CHATBURN,SCOTT PUGRUD	G = Government	QC complete	BLM must fully analyze any impacts to Endowment Lands and Public Trust Lands, including beds of navigable lakes and streams, which might occur from new routes developed during the scoping process for the SEIS.	27030 - Wetlands/Riparian vegetation, 33000 - Water Resources and Use, 34000 - Land Use, 50000 - Segment 8 General, 51000 - Segment 9 – General, 58000 - General project effects on State (Idaho)
101383	1	1	DON HEIDA DAIRY,DONALD HEIDA	B = Business or Business Group	QC complete	Please do not change the route from the NCA. I approve the proposed segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants’ Proposed Route
101384	1	1	CHET LEONARD	I = Individual (s) not affiliated	QC complete	Please allow power poles etc. to be located on BLM land and not our private owned lands.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land
101385	1	1	TIFFINEE LEONARD	I = Individual (s) not affiliated	QC complete	I wish to keep the power lines off our private lands here in Oreana Idaho.	34010 - Private Land/Land Ownership
101386	1	1	CRAIG MOORE	I = Individual (s) not affiliated	QC complete	The BLM and Citizens of Idaho and especially affected Citizens as well as the BLM's RAC advisory committee and sub committee, have worked diligently for years to assist in the establishment of fair and efficient routing for Segments 8 and 9 Gateway West transmission lines. Now that most have agreed to route the lines through The NCA Birds of Prey on Public Lands where possible there is no reason to re-study all or some of previously studied routes that were considered and deemed impractical for many reasons including un-necessary disruption of agricultural lands, as well as near towns, homes and other uses.	25020 - Housing, 25050 - Community/city development and expansion, 25060 - Agriculture, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101387	1	1	MATTHEW W DUCKETT	B = Business or Business Group	QC complete	I approve of the proposed Segment 8 route that RAC has approved. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed route through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101388	1	1	LINDSEY FUQUAY	I = Individual (s) not affiliated	QC complete	I endorse the two routes sited in SRBOPNCA only. I oppose all other routes due to impacts on private, and ag lands and the sage grouse	25060 - Agriculture, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101389	1	1	BARBARA M CARROLL	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA. I strongly approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. There is no need to spend more money looking for other routes. Pease protect our beautiful, productive farmland.	25060 - Agriculture, 50010 - Segment 8 – Applicants’ Proposed Route
101390	1	1	MIKE CHEN	I = Individual (s) not affiliated	QC complete	Please do not destroy our beautiful and productive farm land. Running high voltage power line over thousands of private land and destroying productive farms is making no sense. Utilizing the exist route proposed by RAC that run through the NCA is the only logical solution. Please Do Not Change the route from the NCA	25060 - Agriculture, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101380	1	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	It appears that alternatives in segments 8 and 9 will have dramatic impacts that could further alter, degrade and fragment large areas of sagebrush ecosystems as well as other fragile lands.	28010 - Habitat Fragmentation, 50000 - Segment 8 General, 51000 - Segment 9 – General
101380	2	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	This project could have a large impact on the many wildlife and plant species, including the pygmy rabbit and sage-grouse as well as grassland species such as the long-billed curlew. Many of these habitats throughout the project area are already degraded from many other land uses, etc. livestock grazing disturbance, fences, water developments and ranching infrastructure, agency "treatments" that destroy native vegetation such as sagebrush and juniper.	27000 - Vegetation, 28000 - Wildlife (general), 28060 - Other Special Status Wildlife, 28070 - Sage-grouse
101380	3	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	The "South Hills" International Audubon Important Bird Area, only 8 miles to the east. Over 149 bird species inciuding Sage-grouse are known to move to and from the South Hills IBA every year during all seasons. Red Willow/Prairie Falcon Audubon Monthly bird count done for three years in the Burley BLM F.O. grazing allotments adjacent to the Jarbidge FO that is in	28040 - Migratory Birds, 28060 - Other Special Status Wildlife, 51020 - Segment 9 – Routes considered in the 2013 FEIS

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						the project area segment 9. It is detailed and site-specific. More than 100 species of bird were found including BLM sensitive species.. This includes the Area of Critical Environmental Concern (ACEC) where Gateway West introduced new and additional information in their FEIS concerning the relocation of the transmission line to and through this important area that appears to violate Federal Land Policy Management Act (FLPMA) as well as NEPA. We noted that the map still shows that Gateway wants to proceed with this route. Despite a route already located away from this critical area. PFA has a vested interest and will continue to monitor this area.	
101380	4	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We are increasingly alarmed at migratory bird and bat collisions with transmission lines, and the migration routes and patterns (including areas where birds may be flying low under adverse weather conditions) must be fully examined. Migration routes in the region traversed by Gateway are very poorly understood. When renewable energy project analysis (such as the greatly flawed China Mountain EIS) have been prepared, BLM has not required that industry consultants conduct necessary multi-year intensive radar and other studies necessary to understand the large-scale conflicts with migrating passerines, raptors, or bats, including during inclement weather when migrating birds may be downed. The Gateway line could open up vast areas of deadly industrial wind development and even more powerline sprawl.	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 28040 - Migratory Birds
101380	5	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	The mitigation model is inadequate for sage grouse and other species of conservation concern. How can you mitigate the loss of wildlife habitat?	19000 - Mitigation (general), 28060 - Other Special Status Wildlife, 28070 - Sage-grouse
101380	6	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Access to wildlife areas by the public on BLM lands from new roads to and along new powerlines will further diminish and degrade these places that heretofore were not easily accessed. • As we have already observed in areas of the proposed project, roads and powerlines greatly increase the danger of wildfire, including increased flammable weeds that proliferate in areas of disturbance. The project's new roads and powerlines, will exponentially increase this danger. Fires from Raptor electrocutions have ignited grasses as electrocuted birds hit the ground in Southern Idaho. All of these risks must be considered.	27000 - Vegetation, 27020 - Invasive Plants/weeds, 28020 - Raptors/Eagles/Ravens, 36000 - Recreation, 38000 - Transportation, 40000 - Electrical Environment, 41000 - Public Safety
101380	7	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Is there really a need for the plethora of projects and corridor paths being proposed?	11000 - Purpose and Need for the Project
101380	8	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	PFA and WWP would like the following to be provided/included in the Gateway West Transmission Project Supplemental for Segments 8 and 9 Draft EIS. • A baseline for ecological conditions, and degree and severity of degradation that exists for all routes.	10000 - Conformance with the NEPA process
101380	9	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	• Clear and detailed mapping of biological, cultural, scenic, and other conflicts be provided.	23000 - Visual Resources, 24000 - Cultural Resources
101380	10	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Show how all the alternatives correspond to the latest BLM Idaho Infrastructure Development Map ("Conflict Map") with a comprehensive overlay with Final EIS Map 2013 that's easy for interested public to view.	38000 - Transportation
101380	11	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN	S = Special Interest Group	QC complete	Address the adverse cumulative impacts on sagebrush and other native ecosystems and native biota of a plethora of new corridors/lines/energy developments/disturbances. Detailed in-depth analysis including full	27040 - Native vegetation, 43000 - Cumulative Effects

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			WATERSHEDS,KATIE FITE,JULIE RANDELL			discussion of threats and stressors to each affected habitat and population must be provided and integrated so that a logical science-base conclusion can be drawn.	
101380	12	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Address ongoing threats to the project area such as livestock overgrazing and invasive grasses and weeds, etc. The proposed project would only increase these impacts, these amendments would significantly downgrade protections to important natural resources such as visual, wildlife, and special designated areas	23000 - Visual Resources, 27020 - Invasive Plants/weeds, 28000 - Wildlife (general), 34000 - Land Use
101380	13	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Full analysis of wildlife migration routes for this as well as all other potential routes or segments. Radar data on migrants must be collected for many portions of the route, in all effected BLM FO, the National Bird of Pray Area, and other areas critical to wildlife.	28000 - Wildlife (general), 28040 - Migratory Birds
101380	14	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Analysis of risks, eg. Wildfire. Any LUP changes should include road/OHV closures in any new or upgraded roading caused by this project. Any upgraded roads should be returned to their original condition.	34030 - Federal land Use Plans, 35020 - Mitigation suggestions
101380	15	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Information and independent analysis of why Idaho Power cannot focus on conservation measures with its customers and develop a really good smart grid, rather than wasting power and resources through long-distance transmission, and destroying so many areas of publiic iands along with piacing another iethai hazard to birds and bats across so much public land. How much energy will be required to build this?	10010 - Out of scope comments
101380	16	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Analysis of climate change adverse impacts that may result from Gateway and degradation and risks it poses.	39000 - Air Quality
101380	17	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Tier the proposed actions to the current Idaho Comprehensive Wildlife Conservation Strategy document (ICWCS). These conservation strategies are mandated for all western states and considered a guiding document.	10010 - Out of scope comments
101380	18	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Include any new information, studies, and analysis such as Golden Eagle studies that are done in the project areas.	28020 - Raptors/Eagles/Ravens, 45000 - Literature Used/Not Used
101380	19	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	As this is a project on public lands, a Cost/Benefit analysis be included.	10010 - Out of scope comments
101380	20	2	NATIONAL AUDUBON SOCIETY-PRAIRIE FALCON SOCIETY,WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	Any Plan amendments should be done to designate ACECs or otherwise to enhance and increase biological value, visual resource, or other important protections.	10010 - Out of scope comments
101381	1	1	YOUNG'S RIVERFRONT RANCH, LP,J LAVAR & JANET B YOUNG	B = Business or Business Group	QC complete	I approve the proposed Seg. 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please don't change the route from the NCA. It is the best & safest route for all who are concerned on the Gateway West Transmission line Project.	41000 - Public Safety, 50010 - Segment 8 – Applicants' Proposed Route
101376	1	1	KAREN JENKINS	I = Individual (s) not affiliated	QC complete	I endorse the two routes sited in SRBOP & CA only. I oppose all other routes due to impacts on private lands, ag lands and Sage Grouse habitat. I am a private land owner in Oreana were we farm and ranch.	25060 - Agriculture, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route

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101378	1	1	MICHELE HINTON	I = Individual (s) not affiliated	QC complete	Thank you for taking the RAC subcommittee routes as the preferred routes. Please expand & re-focus your enhancement portfolio as recommended by the RAC. The enhancement & mitigation plan needs to be sufficient to justify going through the Snake River Birds of Prey area.	35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101371	1	1	GEORGENE MOORE	I = Individual (s) not affiliated	QC complete	Run Segment 8 thru the Birds of Prey	50010 - Segment 8 – Applicants' Proposed Route
101371	2	1	GEORGENE MOORE	I = Individual (s) not affiliated	QC complete	After the Kuna fire, the BOP area has been lacking in food and cover for the prey. The settlement for enhancement will benefit the BOP area and it will be less costly than the legal processes to run the line thru farms and ranches	27000 - Vegetation, 28020 - Raptors/Eagles/Ravens, 34010 - Private Land/Land Ownership, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements
101391	1	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	I am writing this comment to voice our displeasure and opposition to the placement of SEGMENT 8 from mile 126 to the Wilson (Hemingway) Idaho Power Substation. This routing of the line is right through the China Ditch subdivision and directly next to our property on China Ditch Road. It runs parallel to Trail Drive Road and is in a (not always) dry river bed.	33000 - Water Resources and Use, 50010 - Segment 8 – Applicants' Proposed Route
101391	2	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	We already have one high voltage power transmission line running over the subdivision on the west and we are highly opposed to having another high voltage transmission line on the east to enclose us in and further degrade our property values. Already we deal with decreased property values due to the size of the substation in our "front yard" and the current transmission line. Even the trees we have planted do little to hide the substation from our sight or the noise emitting from the lines.	23000 - Visual Resources, 25030 - Property Values, 34010 - Private Land/Land Ownership, 42000 - Noise
101391	3	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	my father has a heart pacemaker and defibrillator that causes heaviness and tightness in his chest every time he attempts to take walks anywhere close to the already existing high voltage transmission lines. Because of that, he is unable to go near these lines. Enclosing our property with additional lines on the east side of our home will likely cause an increase in those symptoms and possibly increased health issues for him.	41000 - Public Safety
101391	5	2	WESLEY ANDERSON,ROBBIN ANDERSON	I = Individual (s) not affiliated	QC complete	we do NOT approve the proposed Segment 8 route through the Morley Nelson Snake River Birds of Prey NCA, and the China Ditch Subdivision. Instead, we do approve the BLM Preferred Alternative Routes that move the lines further away from our homes.	50010 - Segment 8 – Applicants' Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101305	3	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	The statement on Page 6 of the August draft that “the Project would have no adverse impacts of the values for which BOPNCA was designated” is erroneous and misleading. The subcommittee found that the routes through the BOPNCA could minimize adverse impacts on resources, but they did not assert that they would eliminate them. In fact, the draft plan itself acknowledges possible adverse impacts, including habitat fragmentation (page 30), damage to slickspot peppergrass populations (pages 29-30) and increased public access on roads that may increase vandalism, weed infestation, and litter (page 34).	27010 - Special Status Plants, 27020 - Invasive Plants/weeds, 28010 - Habitat Fragmentation, 35000 - NCA/SRBOP (general), 36000 - Recreation, 38000 - Transportation
101305	4	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	In addition, the Project will have visual impacts on the landscape as well as direct impacts to important winterfat communities. The transmission lines will likely attract more ravens to the area. Recent evidence suggests that ravens are predators of Burrowing Owls. The Companies' claim that the transmission lines will have no impact on raptors is not substantiated because the Project could adversely affect raptors now nesting on existing transmission lines that the new lines will replace/ parallel if construction activities are not timed appropriately and if the Project does not provide suitable nesting substrates.	23000 - Visual Resources, 27040 - Native vegetation, 28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101305	5	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	The RAC subcommittee could not endorse the enhancement package presented earlier this year, and the August version has not changed substantially. The Companies' enhancement package does not demonstrate how standards of enhancement will be met during the life of the project. The	12000 - Relationships to other federal laws and policies, 25000 - Socioeconomics, 35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to



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						subcommittee encouraged BLM to take a hard look at the true cost of enhancement and advised that although the enhancement package should not be punitive, it must meet the high standards outlined in the BOPNCA legislation. The subcommittee recommended assessments of the environmental, social and economic benefits and costs of lines crossing the BOPNCA, and it encouraged the BLM and the Companies to derive a valid economic assessment of the benefits and costs of the actions specific to the BOPNCA as part of the NEPA process.	NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101305	6	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	<p>I urge the BLM and the Companies to re-consider the RAC subcommittee comments on the Enhancement package. The May 30 report identifies deficiencies in the plan that still have not been addressed, and it recommends actions that have not been included in the revised plan. The subcommittee found that the Draft Portfolio did not adequately address enhancement of raptor populations and scientific resources and values, and it recommended that the BLM and the Companies re-evaluate priorities. The subcommittee recommended that the enhancement package focus on resources within the BOPNCA that are truly in need of enhancement: raptor populations and habitats. The portfolio should be based on a landscape-scale strategy for habitat protection, restoration, and enhancement. It should reduce the emphasis on small microcosms. The RAC subcommittee recommended that the Companies de-emphasize public education in the enhancement plan. The subcommittee found that 1) the BLM already has an excellent public education program for the BOPNCA, 2) many groups are already involved in public education about the BOPNCA, and 3) public education is currently closer to meeting objectives than other programs. The subcommittee recommended re-evaluating whether a land purchase should be a priority because the benefits are not clear. If land purchase is a component of the enhancement package, the subcommittee recommended that some degree of funding should be included to help manage these lands. None of these concerns were addressed in the Companies' revision.</p> <p>The Companies and BLM have invested a great deal of time and money in this project, and it appears they have finally gotten public support for feasible, proposed routes. However, the proposed routes will be dead on arrival if the Companies don't invest more in constructive and effective mitigation and enhancement. Please don't let an insufficient enhancement plan stop the progress that has been made thus far.</p> <p>SPECIFIC COMMENTS ON THE ENHANCEMENT PLAN</p> <p>Page 6: the statement that "the Project would have no adverse impacts of the values for which BOPNCA was designated" is erroneous, misleading, and unsubstantiated.</p> <p>Page 9: Section 2.4 emphasizes the benefits of lattice structures but fails to acknowledge that the double-circuit structures in Segment 9 have been proposed to be tubular metal poles that will not be raptor-friendly.</p> <p>Page 18: the statements that "the transmission line does not adversely affect the resources and values for which this element of the NLCS was designated" and "the project does not have an adverse effect on raptor populations including the raptor prey base, and that no enhancement should be required" are erroneous, misleading, and unsubstantiated.</p> <p>Pages 30-31: As I pointed out in my comments on the draft EIS, these one-mile buffers around nests are meaningless and are not, as claimed, based on the best available science. The probability of affecting raptors depends on topography and other factors, not merely distance. I do not understand why the Companies continue to pursue this useless analysis.</p> <p>Page 31. The statement that "It is clear from the existing literature and</p>	10000 - Conformance with the NEPA process, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 40000 - Electrical Environment, 46000 - Refers to Previously Submitted Comments, 48000 - Design Features



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						observations within the BOPNCA that transmission lines do not adversely affect and apparently enhance the raptor and raven populations” needs to be re-evaluated. Our research (Steenhof et al. 1993) showed that transmission lines COULD (not would) be compatible with raptor nesting, and that nest site modifications could attract raptors and enhance their nesting success. We also stated that we found no short-term effects of electromagnetic fields on raptors but that additional study was needed to evaluate long-term effects. That said, I agree that the BLM’s assertions in the Final EIS that enhanced raptor populations will adversely affect prey populations are unfounded. Page 32: The statement that “there was not an influx in the area due to building of the transmission line” is incorrect. Steenhof et al. 1993 reported that the 500-kV transmission line was “responsible for increased numbers of breeding raptors and ravens in the portions of southern Idaho and Oregon that we surveyed.”	
101307	1	1	KELLI LEAVITT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!	50010 - Segment 8 – Applicants’ Proposed Route
101330	1	1	GERALD GUENTZ,LORENE GUENTZ	I = Individual (s) not affiliated	QC complete	I approve the proposed Segment 8 route the Regional Advisory Committee has proposed the RAC has spent hundred of dollars + hours, thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101331	1	1	OPAL WARD	I = Individual (s) not affiliated	QC complete	I support the routes recommended by the RAC subcommittee as seen in Appendix D-10, D-16, and D-22; in the book of maps on Gateway West Segments 8 and 9 - May 30, 2014.	50010 - Segment 8 – Applicants’ Proposed Route
101331	2	1	OPAL WARD	I = Individual (s) not affiliated	QC complete	I am disappointed in that the Companies did not accept all of the sub committee recommendations about the mitigation and enhancement plan. There are general recommendations, (see pages 12 and 13) and specific recommendations, (see pages 14 & 15) in the RAC Subcommittee review and comments. (May 30, 2014) I would like to know why Idaho Power did not accept the recommendations of the subcommittee - I would like to ask Idaho Power to expand and refocus their enhancement portfolio per the subcommittee recommendations. Does the BLM think the proposed enhancement will be adequate to meet legislative requirements? How will the standard of enhancement be met? The BLM needs to take a hard look at the true cost of enhancement. The proposed funding levels are too low. There should be larger strategic areas for the habitat restoration. Enhancement measures should improve or at least maintain current raptor population levels.	10000 - Conformance with the NEPA process, 28020 - Raptors/Eagles/Ravens, 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101332	1	1	RICK & KRISTI MORINO	I = Individual (s) not affiliated	QC complete	I strongly encourage you to approve the route proposed for segment 8 that is suggested by the RAC. Please do not chance the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101309	1	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We are submitting this cd with current scientific literature that we request you fully consider in developing a suitable range of alternatives for the EIS that must minimize harm to sagebrush species, watersheds, recreational uses and enjoyment of public lands and a wealth of other values.	10000 - Conformance with the NEPA process, 28000 - Wildlife (general), 33000 - Water Resources and Use, 36000 - Recreation, 45000 - Literature Used/Not Used
101309	2	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	The scientific literature also addresses risks posed by invasive species linked to grazing, roading, and other disturbances in the project area; and the risks posed by climate change (activities such as grazing that will be occurring across the lands disturbed by Gateway amplify adverse effects of climate change) and many other factors.	27020 - Invasive Plants/weeds, 38000 - Transportation
101309	3	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We also believe these documents show how flawed the mitigation plan for the Gateway process is – as it does not serve to effectively conserve, enhance and	12000 - Relationships to other federal laws and policies, 28060 - Other Special Status Wildlife, 28070 - Sage-

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						restore sage-grouse and other sensitive and imperiled species habitats, as required by the BLM sensitive species policy, various Land Use Plans, the BLM National Technical Team Report and IMs, and FLPMA. They also highlight the synergistic and cumulative threats facing the native biota impacted b this project.	grouse, 34030 - Federal land Use Plans, 35030 - Applicants' MEP (specific to NCA), 43000 - Cumulative Effects
101309	4	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	As with our comments, protest, Appeals of the preceding process (incorporated in full here), we stress that full current baseline surveys and studies must be conducted for all species of importance and the ecological conditions in this landscape. How viable are current populations of rare or imperiled species? Which populations may suffer significant harm from Gateway? How is poor land health further impacting these habitats and populations?	27000 - Vegetation, 28000 - Wildlife (general)
101309	5	2	WESTERN WATERSHEDS,KATIE FITE,JULIE RANDELL	S = Special Interest Group	QC complete	We request a meeting to discuss our concerns with the current version of the segmented Gateway EIS project with Project Managers. Tis includes what we believe is the purposeful splitting of the process into what now appear to be two EIS processes – yet decisions affecting routes in the current process were made in the previous EIS Record of Decision. BLM must use this current process to correct the seriously flawed route east of Salmon Falls Creek and other areas with high conflicts and that are not in the public interest.	10000 - Conformance with the NEPA process, 51010 - Segment 9 – Applicants' Proposed Route
101353	1	1	MICHAEL STUKEL	I = Individual (s) not affiliated	QC complete	I own 160 acres Southeast of Kuna, Idaho. There is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants' Proposed Route
101308	1	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	I am an emeritus scientist with the U.S. Geological Survey. I have conducted and directed research and monitoring of raptors, prey, and vegetation in the SRBOP for nearly 45 years. I also studied colonization and use of the 500 kV PP&L (PacifiCorp) transmission line by raptors and ravens with agency and industry colleagues for 10 of those years. My comments are based on that frame of reference It is good that the Companies adopted the routes recommended by the Boise District Resource Advisory Council (RAC). In my opinion, these routes provide the best alternatives to avoid private land and sagegrouse issues and to minimize human and resource conflicts.	16000 - Generally support project, 28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101308	2	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	A short-coming of the August 2014 Mitigation and Enhancement Portfolio is that the Companies did not adopt the RAC subcommittee's recommendations in the revision of the portfolio. Because the proposed routes run through the SRBOP, the proposal needs to be accompanied by a substantial plan to mitigate and enhance resources and values within the SRBOP. This plan needs to be accompanied by a strategy to evaluate the effects (enhancing as well as adverse) of the line and to monitor the success of the enhancement and mitigation efforts in the SRBOP. I am pleased to see that portfolio provides a basis in Section 6.3 for developing a plan for monitoring the effectiveness for mitigation and enhancement actions.	20000 - Monitoring, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101308	3	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	“Although the Enhancement and Mitigation package is quite comprehensive, a major deficiency of the package is that it lacks a monitoring component. Given that the package identifies a fairly substantial investment for many enhancement and mitigation actions, it is very important to evaluate the effectiveness of those actions. For example, I sensed at the meeting that there was not complete agreement on the predicted success rate of the habitat restoration efforts. As I stated at the meeting, I commend the parties involved for proposing to undertake such a challenging effort. However, given the extremely dry climate in the NCA in the recent past and predicted for the future, success of restoration efforts in the low precipitation zone in the	20000 - Monitoring, 27000 - Vegetation, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments

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						Grand View and Bruneau areas could be extremely low. Even in decent precipitation years vegetation restoration in these areas could be a challenge. Given the uncertainty, I believe that restoration efforts should be monitored for effectiveness.” “I suggest that the Enhancement and Mitigation package provide for development of a comprehensive, peer reviewed monitoring plan. The monitoring efforts, if designed properly, would provide the opportunity to for adaptive management experiments. The plan should identify the metrics for success. For example, will restoration success be a measure of 101308 Page 1 of 4 vegetation in the restored areas or will it be prey composition and density, or reproductive performance of the nesting raptors?” “Because construction of the transmission lines and the major proposed enhancement actions have the potential to ultimately affect the raptor populations, I believe it is incumbent to monitor the status of the major raptors in the area. I believe that colonization of the transmission line should be monitored much like it was done with establishment of the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993). The monitoring of the PP&L line provided valuable information to the utility, and it also identified the effect of the line on the raptor and raven population.” “It seems to me that the goal of the large-scale restoration efforts is to enhance the habitat and ultimately enhance or maintain the raptors. In my opinion, evaluating the effectiveness of largescale restoration efforts without assessing raptor populations is falling short of completely evaluating the effectiveness of restoration efforts. A well-designed monitoring effort at the three main trophic levels would serve as a good adaptive management experiment for the restoration efforts.” The Companies’ position not consider the raptors in the mitigation and enhancement portfolio because they assert that the lines will pose no adverse effects to raptors could be viewed as short-sighted	
101308	4	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Providing new and secure nesting substrate for many raptor species through construction of the line may be the one of the most positive enhancement efforts the Companies can implement. Also to say the lines will have no adverse impacts on raptors is incorrect. Recent research suggests that ravens are predators of Burrowing Owls, and as Steenhof et al. 1993 have shown, ravens will likely be readily attracted the new 500kV transmission line. If construction activities are not timed appropriately and if suitable nesting substrates are not provided, the Project potentially could adversely affect raptors now nesting on existing transmission lines (such as the Big Baha 138 kV line and the PacifiCorp) that the new lines will replace or parallel	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 48000 - Design Features
101308	5	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	I recommend that the BLM and the Companies re-consider the RAC subcommittee comments on the Mitigation and Enhancement package. As I presented in my January 2014 comments, the portfolio should be based on a landscape-scale strategy for habitat protection, restoration, and enhancement	35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 46000 - Refers to Previously Submitted Comments
101308	6	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Below are my specific comments: Page 6: the statement that “...the Project would have no adverse impacts of the values for which SRBOP was designated..” is inaccurate. Although there may be “few” impacts to raptors, there could be some adverse effects of the lines as I pointed out earlier in my comments. The portfolio even identified possible negative effects of the lines including habitat fragmentation, damage to slickspot peppergrass populations, and increased public access from the new roads.	27010 - Special Status Plants, 28010 - Habitat Fragmentation, 28020 - Raptors/Eagles/Ravens, 35040 - Recommendations for MEP changes, 38000 - Transportation
101308	7	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 9: Section 2.4 emphasizes the benefits of lattice towers like those on the existing 500 Kv PacifiCorp line in the SRBOP. However, the plan needs to clarify that this only applies to Segment 8. The doublecircuit structures in Segment 9 are proposed to be tubular metal poles. It is my understanding this configuration may not be conducive to nesting raptors	28020 - Raptors/Eagles/Ravens, 35040 - Recommendations for MEP changes, 48000 - Design Features

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101308	8	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Pages 30-31: The Companies need clarify the use of the 1.0 mile (1.6 km) buffers around nests because the application is unclear. Is this a disturbance buffer? If the buffer is based on Suter and Jones (1981), the buffer is based on opinions and not quantitative research. Also the probability of the line affecting raptors depends on other factors than just distance, such as topography. It is not clear what kind of analysis the Companies are conducting. Page 32: The statement that “Thus there was not an influx in the area due to building of the transmission line.....” is not entirely correct. I believe the authors are referring to roosting ravens, but it is not entirely clear as written. This needs to be clarified because Steenhof et al. (1993) documented that the 500-kV PP&L transmission line was responsible for increased numbers of breeding raptors and ravens. Also, the PP&L 500 kV line in the 1980s appeared to have drawn in ravens from outside the NCA the roost on the north boundary of the NCA	28020 - Raptors/Eagles/Ravens, 35040 - Recommendations for MEP changes, 45000 - Literature Used/Not Used
101308	9	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 34. No. 7. It is unclear to me how this property purchase will enhance SRBOP values. The BLM and the Companies need to clarify this matter. I would understand the need if there were a potential threat to the cultural resources.	24000 - Cultural Resources, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101308	10	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 40 (top). I believe that it is important that research and monitoring be part of the list. The portfolio identifies a substantial sum to be spent on restoring about 1,500 A, a minute proportion of the amount of area in need of restoration. Given there are differing views on the probability of success of these restoration projects and few restoration projects in the SRBOP have been successful in the last 30 years, it seems to me that funding for research that assesses the trajectory of the system with or without restoration would be appropriate. For example, preliminary research in the SRBOP suggests that some Golden Eagles are quite resilient in extensively burned habitats and may be adapting to altered environment. I personally think understanding the new system in some cases will be more effective than trying to fight it.	20000 - Monitoring, 28020 - Raptors/Eagles/Ravens, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101308	11	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 43. 6.1.4. I agree that enforcing the management rules and informing the public about the SRBOP is greatly needed. However, given the enormous problems with habitat change and threats to the raptor populations, I am dubious about enhancing the public education program. I agree with the findings of the RAC subcommittee on this matter. The subcommittee found that 1) the BLM already has an outstanding public education program for the SRBOP, 2) many groups are already involved in public education about the SRBOP, and 3) public education is currently closer to meeting objectives than other programs	35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101308	12	1	MICHAEL KOCHERT	I = Individual (s) not affiliated	QC complete	Page 47. The Companies’ reasons not to commit to installation of artificial nesting platforms is unclear. It is my impression that the U.S. Fish and Wildlife Service personnel are amenable to nest site enhancements. Also, use of nesting platforms is not new with Idaho Power, particularly on the 138 kV Big Bah power line in the SRBOP. I believe that biologists and engineers should collaborate before line construction to develop tower modifications (including nest platforms) that benefit raptors and deter ravens. Nesting platforms were part of the line construction plan in of the 500 kV transmission line erected by PP&L (PacifiCorp) through what is now the SRBOP. This action was a very positive enhancement effort (Steenhof et al. 1993). Pages 49 - 50. I believe that a representative of the USGS, Forest and Rangeland Ecosystem Science Center (FRESC) should be a member of the oversight committee. FRESC scientists, particularly those from the Snake River Field Station (SRFS), have been conducting research and monitoring of all trophic levels in the SRBOP for decades. Respectfully submitted,	28020 - Raptors/Eagles/Ravens, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 48000 - Design Features

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101306	1	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	<p>These comments follow comments the Golden Eagle Audubon Society submitted to the Bureau of Land Management Resource Advisory Committee Gateway West Subcommittee Co-Chairs (submitted in February 2014). Those comments, which were largely ignored by the Companies during this revision process are included here as Appendix A.</p> <p>General Comments</p> <p>GEAS applauds Rocky Mountain Power and Idaho Power’s (hereafter, ‘the Companies’) pledge to work “in spirit of cooperation” to “meet enhancement requirements” (p. 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, p. 35). However, we are shocked and dismayed at the Companies apparent failure to fulfill on that pledge by undercutting prior offers at substantive support for mitigation and enhancement for completion of the Gateway Transmission line. Unlike, prior versions, the August 2014 documents do not give the impression that the Companies are truly enthused about supporting the intent of the National Conservation Area legislation, nor enhancement of raptor populations or habitats. The complete lack of consideration about how tower lattice structures might be modified to benefit raptors, the inaccurate justifications to reduce funds for habitat restoration, and the lack of suitable support for monitoring – all of which we detail below – are disappointing steps backward and, from our perspective, reduce the likelihood that approvals of these proposed routes will occur. GEAS is expecting the Companies to embrace a landscape-scale approach to enhancing SRBOP and implores the Companies to reconsider this portfolio. We caution the Companies that this current substandard approach will reverse GEAS’s support for routing Segments 8 and 9 through the NCA, and further, we suspect that this portfolio will be widely disparaged by the emerging array of conservation groups that are rallying around the SRBOP landscape.</p>	20000 - Monitoring, 28020 - Raptors/Eagles/Ravens, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route, 48000 - Design Features
101306	2	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	<p>GEAS feels the revised portfolio is not in the spirit of cooperation nor extraordinary in any way. We are disappointed that the portfolio offers a substantially reduced fund value for the BLM-preferred routes. We read through the Companies’ justification for the reduced Fund Value, and we simply disagree with the ecological justifications as well as areal ratio justifications (5.4, p. 37). We object to the questionable reference to state-and-transition modeling approaches as both a justification that the Companies are not accountable or responsible for some habitat restoration and to somehow suggest that state-and-transition models are a tool to ‘write off’ some areas because they have crossed into a state that is not restorable. Because this reference is so erroneous, Portfolio reference cannot be considered “science-based”. Leaving that egregious inappropriate use aside (though we suggest the portfolio authors consult with professionals that design and use such models), we do not agree that “baseline” should be considered current condition of the vegetation (page 36). Enhancement implies a functioning, resilient system and the current condition is not. Pay attention here: if the vegetation community, especially under Segment 9, was in a native functioning state, GEAS would have not recommended it as a potential route. The fact that that area is already degraded is justification for routing a transmission line there, not an excuse for habitat restoration mitigation in the SRBOP. The term ‘mitigation’ implies a trade off, space-for-space. Neither the Companies nor GEAS intended that the restoration would occur immediately under the lines, but rather that restoration is intended to occur on “off-site small-project” areas (Section 5.3, p. 36). Therefore, the current condition of vegetation in the project “footprint” is irrelevant. We are</p>	27000 - Vegetation, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes



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						highly disappointed the Companies use this inference in the first place, and we are insulted they pass this off as “science-based”. Please reconsider – move back toward a spirit of cooperation – and account for the full project footprint (both temporary disturbance and long-term occupancy) when calculating restoration investment ratios.	
101306	3	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	<p>Our second concern is the apparent pull back from the spirit of cooperation (POD Supplement, pages 6, 9, 18, 24) in the new Portfolio. In short, the Companies will sustain equal benefit (amount of power transmitted) no matter where the lines are routed, so why would they offer approximately ½ of the Fund value for BLM-preferred routes (Table 10, p. 49) vs. Proposed routes (Table 9, p. 49). This seems like basic economics. The Companies calculated in their Dec. 2013 Portfolio a Fund Value that was acceptable to the overall cost of routing, therefore, that fund value (approximately \$8.5 million) should be economically viable for the BLM preferred routes described in the August 2014 Portfolio. Instead, the Companies trimmed the margin. GEAS does not consider that extraordinary by any means. In fact, it occurs to us that it is rather ordinary, and a tactic employed by an organization acting exactly opposite of a “spirit of cooperation”. Our admittedly pedestrian assessment of the economics differences among the Proposed routes and the BLM preferred routes is exactly opposite of the revised offer by the Companies. We estimate that the BLM preferred routes will be shorter than the Proposed Routes by about 10 miles. At a rough guess of \$1 million/mile installation costs, the new routes are saving the Companies about \$10 million. Further savings incurred by not having to build as many roads, not having to obtain costly private-land easements, and the availability of flat terrain routing (as opposed to weaving through Owyhee canyon lands and between and around farms and residences) would certainly reduce installation costs. As GEAS suggested right from the beginning, routing lines through SRBOP could be a win-win-win for sage-grouse, raptors, the SRBOP, and the Companies. We are now beginning to seriously doubt the Companies spirit of cooperation. Instead of enthusiastically acknowledging the increased efficiencies achieved by routing through SRBOP and applying some of those cost-savings to improving conditions for raptor populations and habitat, the Companies pulled back, taking a nickel-and-dime approach, and seriously undercut the support and trust they initially garnered from GEAS, other stakeholders, and the RAC subcommittee. GEAS implores the companies: change your stance, invest in the SRBOP, and move ahead with us as a highly valued partner in an enhanced SRBOP.</p>	25000 - Socioeconomics, 35000 - NCA/SRBOP (general), 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101306	4	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	<p>We are also surprised that the Companies would undercut the cost of restoration per acre and not incorporate the cost of restoration per acre calculated in the Gateway West Transmission Line FEIS, released on April 26, 2012. Appendix J and associated tables (6, 7, 8, 9, p. 14-16 and Table D4, p. D-7) describe the methodology for determining costs for mitigation and is prepared by SWCA consultants, Idaho BLM, and Wyoming Fish and Game. Proposed mitigation costs for sagebrush restoration range from approximately \$4000.00 to \$8200.00 per acre and include a 50% markup for indirect costs associated with implementation such as writing of contracts, etc. This approach was developed by Allen et al. (2005) and is supported in the economic literature. The Companies must reconsider their mitigation and enhancement costs and follow methodologies that calculate accurate mitigation and enhancements costs, as well as include ongoing costs resulting from loss of services (e.g. tourism and habitat) that the SRBOP NCA will incur during transmission line construction.</p>	25000 - Socioeconomics, 35010 - Enhancement requirements, 35020 - Mitigation suggestions

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101306	5	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Highly inaccurate success estimate for restoration of native plant communitiesEstimates of 80% success at restoration plots, as we suggested in prior comments, is grossly overstated for revegetation efforts in the SRBOP. The Companies continued reference to those success ratios indicates they are not being sensitive to the vast amount of local plant community ecology and restoration knowledge available. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseeding and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm., USGS) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers (2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understood before implementing a restoration plan in the SRBOP. The Companies must reconsider these erroneous estimates and adjust per-acre investments appropriately.	27000 - Vegetation, 35000 - NCA/SRBOP (general), 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 45000 - Literature Used/Not Used
101306	6	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Missed opportunity to enhance raptor nesting and perching sites The Companies claim that the transmission lines will have no impact on raptors (POD Supplement, page 33) is not substantiated because the Project could adversely affect raptors now nesting on existing transmission lines if the new structures do not have suitable alternative nesting substrates. Section 2.4 of the POD Supplement emphasizes the benefit of lattice structures but fails to acknowledge that the double-circuit structures in Segment 9 are proposed to be tubular metal poles that will not be raptor-friendly. Research in the NCA has shown that transmission lines might be beneficial to raptors (Steenhof et al. 1993). But that benefit is not inherent: nest site modification might be necessary to ensure they provide suitable, safe benefit to raptors. The Companies failure to commit to installation of artificial nesting platforms (page 47) is very disappointing, especially since the Companies highlight and advertise this practice in literature describing their corporate social responsibility. It is essential that engineers work with biologists – and SW Idaho is highly populated with very experienced raptor biologists – before line construction to ensure that tower modifications include safe, effective nest platforms that benefit raptors and deter ravens.	28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 48000 - Design Features
101306	7	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	The Companies claim that prey populations are not affected by the enhancement of raptor and raven populations is utterly false. The Companies failed to implement a complete literature review on the effects of transmission lines on prey populations due to an enhancement (increase) of avian predators. Benitez-Lopez 2014, Coates et al. 2014, Coates and Delehanty 2010, Dinkins 2013, Howe et al. 2014, Leu and Hanser 2011, and Shroeder, 2010 demonstrate the effect of enhanced avian predator populations resulting from transmission lines on prey populations. This effect has been largely studied now in sage-grouse populations and is why we recommend avoiding transmission line construction in or within close proximity to sage-grouse habitat. Furthermore, there is much literature available on the negative effects transmission lines have on small mammal populations due to habitat fragmentation causing loss and degradation of habitat and isolated populations	28000 - Wildlife (general), 28010 - Habitat Fragmentation, 28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 45000 - Literature Used/Not Used

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101306	8	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Lack of a reliable monitoring strategy Permit PL 103-64 charges the BLM with demonstrating that the enhancement program will result in a net benefit to SRBOP for the duration of the permit. Because the Companies have not shown the needed investment in monitoring of raptor population, prey response, and habitat restoration, GEAS feels the Companies may invalidate the intent of the permit. Monitoring is an essential part of the mitigation and enhancement program and the Companies must appropriately fund the costs of a well-rounded, long-term monitoring strategy that address the investments of this draft MEP. With appropriately funded monitoring, the Committee and BLM would be able to assess and identify restoration strategies that work best, evaluate recovery rates and responses of wildlife to those strategies over time, and fully utilize an adaptive management approach. This in turn would benefit all stakeholders involved, especially the Companies. Results of this inclusive monitoring strategy could save the Companies millions in the future, allowing them to target essential habitat restoration/mitigation and enhancement practices beneficial for future transmission line projects. However, if monitoring is not adequately funded, results will be lost and BLM will not be able to demonstrate that the Companies mitigation and enhancement investment was successful. Again, GEAS believes that results and information gathered from an efficient monitoring strategy can be very useful in demonstrating the Companies’ corporate social responsibility and commitment to the public at large.	20000 - Monitoring, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101306	9	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Conclusion The Companies state: “Though the Companies believe that the project does not have an adverse effect on raptor populations, including the raptor prey base, and that no enhancement should be required, in the spirit of cooperation offer this Draft MEP to allow the BLM to approve routes across the BOPNCA.....” p. 18. We believe that this proposal does not demonstrate a “spirit of cooperation”. This proposal saves the Companies millions of dollars in construction and yet they refuse to fund actual costs of mitigation and enhancement for the SRBOP NCA that Idahoans care deeply about. This statement indicates that the Companies have not read or understand the scientific literature demonstrating the effects of transmission lines and corridors across the United States. The scientific literature has demonstrated, over and over again, that transmission lines significantly fragment landscapes resulting in smaller patches of habitat, cause a direct loss of wildlife habitat, kill migrating birds, alter wildlife movements, are a conduit for invasive species , and are not desired near private lands because they significantly reduce property values.	25030 - Property Values, 27020 - Invasive Plants/weeds, 28000 - Wildlife (general), 28010 - Habitat Fragmentation, 28040 - Migratory Birds, 34010 - Private Land/Land Ownership, 35030 - Applicants’ MEP (specific to NCA), 45000 - Literature Used/Not Used
101306	10	3	GOLDEN EAGLE AUDUBON SOCIETY,MICHELE CRIST,SEAN FINN,ALISON LYON-HOLLORAN	S = Special Interest Group	QC complete	Appendix A: Comments submitted to the Bureau of Land Management Resource Advisory Committee Gateway West Subcommittee Co-Chairs (February 2014) in response to the Mitigation and Enhancement Portfolio, Version 2, (dated 1/10/2014). General Comments: GEAS applauds Rocky Mountain Power and Idaho Power’s (hereafter, ‘the Companies’) effort to work “in spirit of cooperation” to “meet enhancement requirements” (page 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, page 35). The Portfolio indicates that the Enabling Legislation for SRBOP, Public Law 103-64, established the SRBOP in 1993 for the “...conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values....” Section 2(4) of the Act defines the term “raptor habitat” to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area. Furthermore, it	35000 - NCA/SRBOP (general), 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments

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						<p>references the 2008 SRBOP Resource Management Plan (RMP) indicating: “the SRBOP is managed by BLM under the concept of dominant use rather than multiple use. This means that prior to authorizing uses, BLM determines the compatibility of those uses with the purposes for which the NCA was established.” Based on the Public Law and the RMP, the Portfolio states (Page 33, Sect. 8.2) that, “locating utilities within these (designated) corridors is consistent with the RMP and with the enabling legislation for the SRBOP and therefore should require no additional enhancement to be consistent with the enabling legislation.” GEAS does not agree with this position. Degradation to raptor habitat as a result of powerline construction is not consistent with enabling legislation. Enhancement therefore is a required act to mitigate for reduction and damage to raptor habitat, not simply an in-kind act “in the spirit of cooperation”. Further, it is the Companies responsibility as a direct economic beneficiary of the line installation to ensure – for the long-term – that raptor habitat is not degraded as a result of the powerline. The Portfolio correctly cites the SRBOP RMP stating, “to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded (page 36)”. Thus, to meet RMP objectives as well as operate in the spirit of cooperation, the Companies should be seeking to expand and inter-connect native vegetation in order to achieve objectives stated in the RMP. GEAS contends that the Companies are in a positive economic situation right now as they have saved significant expenses by routing Sections 8 and 9 through SRBOP – a decision GEAS vocally supported with comments submitted during the Final Environment Impact Statement comment period. The Companies saved substantial dollars by using SRBOP because the route covers fewer miles, there is less need to compensate private landowners, and there are minimal new road construction costs. Funding the restoration approach we propose is not out of the realm for the Companies and is in the Companies best interests to demonstrate their social responsibility and sustainability highlighted in their business plans and reports. Specific Comments and Recommendations The most critical component to long-term stability of the world-renowned raptor populations of SRBOP is maintenance and enhancement of native vegetation communities that support diverse, abundant prey bases for the raptors. Therefore, GEAS provides comments that can lead to the direct actions necessary to achieve habitat restoration and enhancement goals. GEAS proposes the use of an integrated and adaptive approach where restoration is applied. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseeding and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers (2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understand before implementing a restoration plan in the SRBOP. Cheatgrass presence complicates these efforts. The invasion of cheatgrass has changed the fire frequency in sagebrush systems such as the SRBOP where, prior to cheatgrass invasions, fire occurred on average every 70 years. Cheatgrass presence has accelerated fire return intervals to 5 to 7 years, a drastic change that has completely altered habitat in the SRBOP and makes remnant stands of native</p>	

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						<p>vegetation a vital element of the long-term health of SRBOP and its ability to support raptors. Thus it is critical to first protect remnant sagebrush patches using firebreaks (i.e., forage kochia) as proposed by the BLM fuels experts (L Okeson, pers. comm.). As restoration activities progress, firebreaks may be modified (i.e., replaced with native vegetation to connect restored areas and planted around the newly restored and connected patches) to help ensure protection from future fire. Likewise, much effort has been expended on habitat enhancement in SRBOP, yet we know very little about what factors influence success and failure. GEAS proposes a restoration approach that is informed by ongoing research, designed to test and improve our knowledge as restoration is implemented, spatially explicit, and timed to appropriately capitalize on optimal weather conditions. Ongoing restoration research carried out by the NCA Restoration Working Group is well suited to inform the Companies restoration efforts as they develop new techniques and understand the importance of seasonal and annual timing of implementation as a key factors influencing success (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.). The Work Group should be a key element of project planning and their published information and monitoring data should be employed as specific strategies are developed. Restoration initiated through the Enhancement and Mitigation Portfolio should start with these data in hand. Initial restoration plots should be placed and planted so they build upon and improve the research data, and bridge to application at larger spatial extents. That is, plots should be placed in areas that will eventually connect remnant native vegetation patches and seeded/planted in a range of treatments the Work Group research shows have higher success probabilities. This approach is critical to prepare for the second, larger application: because the actual restoration implementation must be timed with optimal weather, this “learn-do” approach will increase the likelihood of success when full implementation occurs. GEAS recommends that this restoration approach begin with the identification of the key remnant native sagebrush patches within the SRBOP that exhibit ecological integrity and are still “intact”. These areas are the “base” for this type of approach. The second step would focus restoration efforts in areas between these key remnant patches in an effort to connect these key areas together. The overall goal of this approach is to eventually create ecologically intact, large, and connected sagebrush areas important for the many species that thrive in these conditions. The timing of restoration actions as specified above and success for restoration is dependent upon precipitation (large rain events) in the spring before restoration actions (planting, etc.) occur. It is imperative that restoration funds be flexible. Funds must be banked and allocated when the conditions are right for restoration actions. The restoration fund can be accessed when the conditions are prime for restoration actions. GEAS recommends the funding committed by the Companies be established as a Trust Fund which is managed by a Board or Oversight Committee. The Committee should have discretion to apply or reserve funding in a time-sensitive context (i.e, commit restoration funds in positive weather years). The Trust would serve a second function as a pot of ‘matchable’ dollars that could attract additional funds to augment restoration of SRBOPA. As restoration actions occur, monitoring must be implemented to quantify and understand where and why success rates are high, address challenges and failures, and allow for adapting the restoration approach over the years so that the dollars spent on restoration will be successful over the long-term. The Portfolio fails to specify a monitoring effort. This is an important aspect that must be addressed and is crucial to the success of this approach. If vegetation reestablishment is the goal, then appropriate</p>	



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						<p>vegetation monitoring protocols must be put in place with data collected both before and after construction on the line, within the key remnant sagebrush patches, and at sites designated for restoration and mitigation. Monitoring needs to be carefully considered and matched to expected outcomes temporally and ecologically. For example, restoration actions over a relatively small proportion of SRBOP are not likely to have measurable effects on, for example, prairie falcon populations across the entire SRBOP. It may, however, have some influence on nest success or breeding density of proximal nesting territories. Likewise, demographic response by prairie falcons may lag habitat recovery by several years. These examples illustrate the need for a thoughtful monitoring approach that begins with fine-resolution, vegetation monitoring and eventually scales to measuring the response by raptors that are most likely to be influenced by the restoration. The monitoring strategy should be implemented using an experimental design, where “control areas” and “experimental areas” are monitored so that comparisons can be made to determine successes, address failures, and inform late stage and future restoration actions accordingly. Again, this monitoring effort is critical to the adaptive restoration process and is required by BLM regulations. GEAS proposes action on an overall approach that meets the enabling legislation and RMP guidance, employs the best science while engaging the fuels expertise at BLM, and sets the stage for a more programmatic approach to habitat recovery in the SRBOP. Coordination between BLM land managers and ecologists, the Companies’ natural resource and administrative specialists, and the NCA Restoration Working Group is critical to implement this approach. GEAS is committed to this collaborative, adaptive approach and pledges continued participation where appropriate. Additional Comments on Enhancement and Mitigation Recreational Shooting Although not directly addressed in the Portfolio, GEAS members are strongly in favor of a shooting closure within 200 yards of new and existing powerlines as well as access roads. A shooting closure is consistent with and supports a range of recommendations and offerings in the Portfolio. For example, the Portfolio indicates that, “access roads ... may increase the risk of vandalism ... (page 32).” A shooting ban of 200 yards from roads and powerlines would be enforceable (consistent with Law Enforcement provisions, page 37) and discourage both firearm-caused vandalism and additive mortality to raptors and prey. Furthermore, we contend that one of the greatest threats shooting brings to the SRBOP is the potential for fire ignition. There are numerous incidents of target-shooting-related fire ignitions in southwest Idaho, some of which sparked immense, destructive blazes. Wildfire is a recognized threat to native vegetation (and consequently small mammals and raptors) in the SRBOP and an economic threat to the powerlines. A shooting ban would reduce all of these threats and, when paired with increased law enforcement, is completely enforceable. Vegetation Restoration (reclamation) Regarding plant/seed mixtures: Page 36 states “mixes should include shrubs that are suitable for small mammals.” While we don’t argue with this intent, we expect that shrubs and forbs planted and seeded need to be a close match to the local soil and climate conditions... i.e., native plants. It’s important this is clearly stated. Regarding the need for better (more accurate and precise) maps of proposed restoration: i.e., “... developing a geodatabase layer using the proposed facility locations and then overlaying that “footprint” database, whether for construction or operation footprint, with the relevant vegetation or land ownership geodatabase layer.” GEAS recommends the restoration effort be fully informed with highly accurate spatial data and planning. SRBOP is one of the best-mapped areas in Idaho with a long history of spatial data. In</p>	

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						<p>preparation for spatial planning, the best available data on historic restoration activity and restoration research should be overlaid with topography, soils, fire perimeter and other GIS layers to ensure proper construction sighting, mitigation siting and restoration actions. Page 36: “in accordance with the RMP, habitat restoration projects should be located in areas where it is most beneficial to raptor prey populations” therefore a spatial component to the restoration exercise is essential. Need ‘security’ fund for fire response on top of management; page 32 cites a concern that “access roads ... may increase risk of vandalism, weed infestation, litter, etc.” We feel that the increased risk of fire ignition is the most critical threat posed by increased access. Some 80% of fire ignitions in the NCA are human-caused (L. Okeson, pers. comm.). We agree, that access also means quicker response to fire ignition but we also know that fires expand rapidly. Therefore we suggest a dedicated effort to sign the areas regarding risks and costs of wildfire and a proactive effort to deter ignitions (including a firearm ban). Raptor nest/perch augmentation Proactive retrofitting is an important element especially to honor the intent of the NCA as a world-renown site for Birds of Prey (NCA not an end unto itself ... they are identified and situated for specific resource functions; SRBOP specifically designated for raptors, use for other purposes must be compatible with enhancements for BOP). GEAS recommends retrofitting existing structures where appropriate to enhance nest and perch sites for raptors. Leave structures on removed lines Page 39 and 40, referring to removal of Swan Falls to Bowmont line and Mountain Home to Bennet line: GEAS recommend the companies do not remove structures that are suitable for raptor and raven nest and perches. We recognize there may be safety considerations but recommend that all structures that are not deemed unsafe be left. In addition to opportunities for raptors and ravens, many cavity nesting (excavators and secondary) will benefit from the nest site opportunities. Furthermore, a wide variety of birds would benefit for the elevated perch opportunities. We recommend that cost savings of structure removal be redirected to (1) decommissioning and restoration of the service roads for these lines (thus improving and protecting slickspot peppergrass habitat), and (2) enhancements on the primary lines. GEAS recommends the Enhancement Portfolio reference using ‘state of the art’ guidelines to add desirable nest opportunities. Monitoring As stated above, monitoring needs to be a specific element of the Portfolio. GEAS recommends that the Portfolio references the BLM Assessment Inventory and Monitoring program and any local (i.e., NCA specific) monitoring protocols and specifically describes the need for targeted monitoring of vegetation response to restoration, small mammal population trend, and raptor response to nest and perch enhancement. Monitoring is best conducted under an experimental design so trials inform subsequent efforts and expenditures. Vegetation Page 36: ... “to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded.” Monitoring of upland native shrub is critical to measure success of restoration actions. Prey base Page 36: Citing the SRBOP RMP: the greatest benefit to raptors is in the stabilization of the prey base” thus no amount of restoration nor reclamation will meet RMP standards unless the prey base responds and the only way to accurately test this is through monitoring of the prey populations themselves. Raptors Monitoring protocols should be put in place to understand the effects of the line and help target measures to address any negative impacts through further management action. Ultimately enhancement measures should improve or at least maintain current population numbers in the area. Again, Golden Eagle Audubon Society Board of Directors appreciates this opportunity</p>	

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						to comment on the Gateway West Enhancement and Mitigation Portfolio. We look forward to further engagement in successful siting of the Gateway West line in SRBOP and in successfully enhancing native vegetation, small mammal, and raptor communities in southwest Idaho. On behalf of the Golden Eagle Audubon Society Board of Directors, Sean Finn Conservation Committee Chair	
101351	1	1	L CLARK OLSEN	I = Individual (s) not affiliated	QC complete	I agree with the proposed route for segment 8 as proposed by RAC.	50010 - Segment 8 – Applicants’ Proposed Route
101351	2	1	L CLARK OLSEN	I = Individual (s) not affiliated	QC complete	I do not agree with any plan to route the transmission line thru farms, dairies & other private land near Kuna & Melba. I have seen how transmission lines in other states have disrupted private land / property and we don't need a line running thru private properties the proposed route is the best alternative if we have to have any choice in the matter.	25060 - Agriculture, 34010 - Private Land/Land Ownership, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing)
101352	1	1	TIM FONTAINE	I = Individual (s) not affiliated	QC complete	Looking at other routes is not needed. Segment 8 route I approve please don't change the route from NCA area.	50010 - Segment 8 – Applicants’ Proposed Route
101354	1	1	KASPER LAND CATTLE LLC,TOM KASPER	I = Individual (s) not affiliated	QC complete	My concern is the location of Segment 8. We have a dairy operation located North of the Snake River in Melba close to Celebration Park. The proposed location of the second row of power lines will be 905 feet from the cow corral steel fence. My question is what impact the dairy operation would receive from a high voltage power line. Will the high voltage affect dairy cows dry matter feed consumption, lower milk production, milk quality, behavior, and conception rates> If the power lines do come close to the dairy operation, I would then have to record and take measurements of the previously mentioned concerns prior to the newly installed power lines is charged. Another concern is what affect high voltage would have on the milk barn equipment. We have several sensitive electronic computer controlled mechanical operation of the micro switches. Our diary is a 24/7/365 constant operation. Any impact to the dairy operation would be economically severe.	20000 - Monitoring, 25000 - Socioeconomics, 25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 40000 - Electrical Environment, 50010 - Segment 8 – Applicants’ Proposed Route
101354	2	1	KASPER LAND CATTLE LLC,TOM KASPER	I = Individual (s) not affiliated	QC complete	Another concern is the location of a second power line close to Celebration Park. Even though the proposed second power line will be located just north of the existing power line, it still is quite visual to the public at the Park. One power line can be ignored put a second line would give a negative industrial look. I would think that kind of perception would take away the wilderness concept from the public minds if there were to happen. A lot has been invested in this park and it is visited by large groups weekly.	23000 - Visual Resources, 34040 - Wilderness/Wild and Scenic Rivers , 36000 - Recreation
101355	1	1	RALPH CLAYTON	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA. There is no need to look at other routes and I approve the proposed Segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants’ Proposed Route
101356	1	1	KENNETH WIRZ	I = Individual (s) not affiliated	QC complete	There is no need to look at other routes. I approve the proposed segment 8 route that the RAC has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101357	1	2	JAMES GOULD,JOYCE GOULD	I = Individual (s) not affiliated	QC complete	We strongly recommend the proposed Segment 8 route recommended by the RAC, the Regional Advisory Committee. Thousands of dollars and a multitude of man hours were spent in reviewing many routes. They concluded the best route was through NCA proposed location. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101361	1	1	LYONS DEVELOPMENT, LLC,BARTON FRED LYONS	I = Individual (s) not affiliated	QC complete	There is no need to look at new routes and I approve the proposed segment 8 route that the Regional Advisory Committee has proposed. RAC has spend hundred of hours and thousand of dollars on the proposal. Please do not deviate from their proposed route through the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101303	1	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	During the Supplemental EIS process, BLM must consider all the route options submitted by the subcommittee. The BLM cannot be biased towards an option or else the EIS would become a “foreordained formality” and not meet the requirements of NEPA. In order to avoid any question of bias during the SEIS process, the BLM should not give undue weight to the routes recommended	10000 - Conformance with the NEPA process, 15000 - Comparison of Alternatives, 35000 - NCA/SRBOP (general), 50030 - Segment 8 – RAC Route Options, 51030 - Segment 9 – RAC Route Options

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						by the subcommittee. The subcommittee identified a dozen or more routes and segments of routes that could be pieced together to meet the proponent’s needs that are outside the NCA. BLM must equally consider these viable routes.	
101303	2	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	The BLM has a legal requirement to manage the NCA for the “protection, maintenance, and enhancement of raptor populations and habitats” and “the natural and environmental resources and values associated therewith, and of the scientific cultural, and educational resources and values” (16 U.S.C 460iii-3(b)(7)). Secretarial Order 3308 further expounded on these conservation standards by stating, “BLM shall ensure that the components of the [National Conservation Lands] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.” To be a viable option, the BLM must show that the siting, construction and maintenance of a transmission line through the NCA protects, maintains or enhances: 1) raptor populations and habitat; and 2) natural, environmental, scientific, cultural and educational resources and values.	24000 - Cultural Resources, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements
101303	3	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	In 2012, the BLM released Policy Manual 6220, which set specific guidance for BLM concerning the granting of new rights-of-way through units of the National Conservation Lands. In fact, it creates a presumption the BLM will not approve new rights-of-ways in National Monuments and National Conservation Areas. The manual states: “To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designation or authorizing use of transportation or utility corridors within Monuments an NCAs. To that end, and consistent with applicable law, when developing or revising land use plans for Monuments and NCAs, the BLM will consider” a. Designating the Monument or NCA as an exclusion or avoidance area; b. Not designating any new transportation or utility corridors with the Monument or NCA if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the Monument or NCA was designated; c. Relocating any existing designated transportation and utility corridors outside the Monument or NCA. The BLM must apply its own policy and the appropriate standards when considering siting segment 8 and 9 of the Gateway Transmission Line.	12000 - Relationships to other federal laws and policies, 34030 - Federal land Use Plans, 35000 - NCA/SRBOP (general), 50000 - Segment 8 General, 51000 - Segment 9 – General
101303	4	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	In our view, the proponents suggested Mitigation and Enhancement Portfolio is wholly inadequate and based on erroneous and misleading assumptions. We agree with the section of comments submitted by subcommittee co-chair Karen Steenhof that pertain to the inadequacy of the Portfolio and the proponent’s mischaracterization of impacts on the NCA. The Portfolio must more thoroughly, meaningfully and effectively address the impacts to the resources of the NCA. Mitigation and enhancement efforts need to be in effect as long as the impacts of the transmission line are present. We would also note that a mitigation and enhancement portfolio should not be considered until BLM has shown that siting, building and maintaining a transmission line cannot be otherwise routed and will ultimately protect and enhance the resources and values of the NCA.	35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments
101303	5	3	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,CONSERVATION LANDS FOUNDATION,NADA CULVER,DANIELLE MURRAY,JOHN ROBISON	S = Special Interest Group	QC complete	Effects on Sage GrouseThe siting of Segments 8 & 9 requires BLM to balance several conflicting policies and interests; BLM is required to evaluate impacts, mitigation and protection opportunities for a variety of resources on both public and private land. We are particularly concerned about the impacts to sage grouse. The U.S. Fish and Wildlife Service has found the greater sage	19000 - Mitigation (general), 28070 - Sage-grouse, 46000 - Refers to Previously Submitted Comments

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						grouse warrants protection under the Endangered Species Act. During the SEIS process, the BLM should consider avoiding, minimizing and mitigating harmful, and potentially irreversible impacts to sage grouse. (Please refer to an October 12, 2012 Letter, submitted by The Wilderness Society, Idaho Conservation League, The Nature Conservancy in Idaho and the Conservation Lands Foundation).	
101310	1	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	We continue to believe that the EIS should include a discussion of who would manage the In-Lieu Fee (ILF) for this project's unavoidable aquatic resource impacts. We also continue to believe that the EIS should discuss reasons why an ILF would be the appropriate approach. We recommend that the BLM obtain a status update for this project's Clean Water Act Section 404 compensatory mitigation efforts from the Corps of Engineers and provide related information in the SEIS. An update on mitigation efforts for aquatic resources would help to ensure that project impacts on Segments 1-7 and 10 are consistent with the 2013 Final EIS.	18000 - Comments on segments 1 to 7 & 10, 19000 - Mitigation (general), 27030 - Wetlands/Riparian vegetation, 33000 - Water Resources and Use, 46000 - Refers to Previously Submitted Comments
101310	2	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	With regard to siting constraints, we continue to believe that flexibility in setting transmission line separation distances can help reduce impacts to sensitive resources. We are pleased to see the BLM's and the applicants' efforts to utilize smaller common corridors and opportunities to "double circuit" new and existing transmission lines. We agree that these are useful techniques for reducing the physical and visual footprint of new lines.	23000 - Visual Resources, 48000 - Design Features
101310	3	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	We reiterate that both the EPA and the BLM have also recommended consistent application of Environmental Protection Measures on federal and non-federal lands to the applicants. We also understand that the BLM cannot require the implementation of protective measures on non-federal land. To address our ongoing interest in consistent application of protection measures, we recommend that the SEIS include updated information on which Environmental Protection Measures will apply to federal and non-federal lands. Where Environmental Protection Measures only apply to one land ownership type, implications for different environmental impacts should be disclosed in the EIS.	34010 - Private Land/Land Ownership, 50000 - Segment 8 General, 51000 - Segment 9 – General
101310	4	1	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,ERIK PETERSON	G = Government	QC complete	Mitigation and Enhancement Portfolio Proposal and Boise District Resource Advisory Committee Similar to our 2011 comments on the Draft EIS and our 2013 comments on the Final EIS, we commend the BLM, cooperating agencies, and the proponents for your planning efforts on this project. The Morley Nelson Snake River Birds of Prey National Conservation Area DRAFT Mitigation and Enhancement Portfolio Proposal and the Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area are evidence of substantial and effective planning efforts. In terms of comparing environmental impacts from alternatives, the SEIS should address each alternative's environmental impacts with consideration of mitigation enhancement proposals.	35030 - Applicants' MEP (specific to NCA)
101304	1	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I am writing this letter once again as I am very concerned about the route selection for segment 9 , specifically Alternative 9E, of the Gateway West Transmission Project. I am concerned for how it would ruin our eastern Owyhee front , a place of beauty and awe. I am also concerned for the Greater Sage Grouse , I think already listed as an threatened species and how the impact of 9E would have on their survival.	23000 - Visual Resources, 28070 - Sage-grouse, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101304	2	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I would like to say I support the proposed Segment 9 Alternative through the Snake River Birds of Prey National Conservation Area. I think it is marked 9D/F/G/H on the project map. There are already existing power lines, and I firmly believe we should not pollute any more of our beautiful open spaces	51010 - Segment 9 – Applicants' Proposed Route, 48000 - Design Features



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						with these power towers and keep them sharing similar corridors whenever possible.	
101304	3	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I have also been told by my friend Dale Herter a expert ornithologist and Karen Steenhof that this route through the Birds of Prey would actually benefit the raptors , giving them more places to perch and hunt.	28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101304	4	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	I am happy that the Companies have adopted the Resource Advisory Council (RAC) subcommittee’s recommended routes as their proposed action. By avoiding private land and sage-grouse habitat, these routes minimize conflicts with people and resources .	28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 51010 - Segment 9 – Applicants’ Proposed Route
101304	5	1	CONNIE HOLLOWAY	I = Individual (s) not affiliated	QC complete	.I am disappointed that the Companies did not adopt the RAC subcommittee’s May 30, 2014 recommendations about the Mitigation and Enhancement Portfolio in their August revision of that document. The proposed routes will not be acceptable to BLM and Conservation Lands advocates if they are not accompanied by a substantive and meaningful plan to mitigate and enhance resources and values within the Morley Nelson Snake River Birds of Prey Area. The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation. I strongly urge the BLM and the Companies to re-consider the RAC subcommittee comments on the Enhancement package. The May 30 report identifies deficiencies in the plan that still have not been addressed, and it recommends actions that have not been included in the revised plan. The Companies and BLM have invested a great deal of time and money in this project, and it appears they have finally gotten public support for feasible, proposed routes. However, the proposed routes will be dead on arrival if the Companies don’t invest more in constructive and effective mitigation and enhancement. Please don’t let an insufficient enhancement plan stop the progress that has been made thus far.	12000 - Relationships to other federal laws and policies, 35010 - Enhancement requirements, 35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 46000 - Refers to Previously Submitted Comments
101305	1	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	I am very happy that the Companies have adopted the Resource Advisory Council (RAC) subcommittee’s recommended routes as their proposed action. By avoiding private land and sage-grouse habitat, these routes minimize conflicts with people and resources	28070 - Sage-grouse, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101305	2	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	However, I am very disappointed that the Companies did not adopt the RAC subcommittee’s May 30, 2014 recommendations about the Mitigation and Enhancement Portfolio in their August revision of that document. The proposed routes will not be acceptable to BLM and Conservation Lands advocates if they are not accompanied by a substantive and meaningful plan to mitigate and enhance resources and values within the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA). The Record of Decision issued by the BLM in November 2013 called upon BLM to evaluate and refine the Mitigation and Enhancement plan to ensure that it is sufficient to meet the enhancement requirements of the legislation that designated the BOPNCA. To authorize a right-of-way (ROW) under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that an enhancement program will result in a net benefit to the BOPNCA for the duration of the permit (PL 103-64). The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation.	10000 - Conformance with the NEPA process, 12000 - Relationships to other federal laws and policies, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101305	7	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	Page 34. I am glad that the Companies recognize that new roads will result in increased public access to parts of the BOPNCA. In addition, to increasing vandalism, weed spread, and litter, the roads will likely increase the incidence of recreational shooting. If BLM cannot close roads to shooting, then the	27020 - Invasive Plants/weeds, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general), 36000 - Recreation, 38000 - Transportation

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						Companies should fund studies of the effects of recreational shooting on raptor and prey populations as well as the extent of lead in the BOPNCA environment, as proposed by the Subcommittee.	
101305	8	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	Page 40. The relevance of the discussion of livestock effects on riparian areas is unclear as the proposed routes will be affecting few if any wetland areas.	27030 - Wetlands/Riparian vegetation, 35030 - Applicants' MEP (specific to NCA)
101305	9	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	Page 47. The Companies' failure to commit to installation of artificial nesting platforms is very discouraging. During RAC subcommittee meetings, U.S. Fish and Wildlife Service staff committed to agreeing to nest site enhancements on power line structures. It is essential that biologists and engineers work together before line construction to come up with tower modifications (including nest platforms) that benefit raptors and deter ravens. It would be wrong to defer this critical task to the Oversight Committee. At a minimum, the Companies should support monitoring of raptor nesting density and productivity on the existing lines that the new lines will parallel and replace both before and after new construction.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants' MEP (specific to NCA), 48000 - Design Features
101305	10	1	BLM RAC SUBCOMMITTEE,KAREN STEENHOF	I = Individual (s) not affiliated	QC complete	<p>I have some additional suggestions for the Mitigation and Enhancement Portfolio that the Companies and BLM should consider.</p> <p>First, the tubular metal Poles proposed for supporting the double-circuited portion of Segment 9 will likely be unattractive to raptors for perching and nesting. I suggest that the Companies leave and maintain the structures supporting the existing 138-kV line that the new line would replace. Some of these structures already support artificial platforms used by raptors for nesting. I suggest that the Companies install additional nesting platforms on structures to achieve a density of approximately 1 platform per kilometer within the BOPNCA. Metal artificial platforms similar to those on the existing 500-kV line should be constructed on some of the new lattice towers within the BOPNCA. Where the new line will parallel the existing 500-kV line, new platforms should be staggered with existing transmission tower platforms (Miles 96, 104, 109, 111, 113) to achieve a density of approximately 1 platform per 2.5 miles within the BOPNCA. Pre- and post-construction monitoring of raptor and raven nesting and productivity should be used to evaluate the effectiveness of these efforts.</p> <p>Second, there may be an opportunity to enhance habitat on the private land in Canyon County that the new transmission line is proposed to traverse. Golden Eagles nested on Tower 119/3 of the existing transmission line from 1983 to 2004 but not since 2004. Changing agricultural practices and disturbance associated with farming activities might have been responsible for eagles abandoning the site. I suggest the Companies consider agreements with the landowner that would involve habitat restoration (possibly with the aid of irrigation) and a reduction in disturbance that might attract eagles back to this area.</p> <p>Finally, as noted in earlier NEPA documents, construction activities could cause raptor nest failure or abandonment. I was unable to find proposed timing restrictions on construction in either the enhancement package or the plan of development, so I was unable to verify if the Companies have committed to any specific timing restrictions on construction within the BOPNCA. I suggest that the mitigation/enhancement plan clearly state any timing restrictions for each raptor species. Timing restrictions on construction near raptor nests, particularly those on existing transmission lines, should apply to the complete nesting season: courtship through post-fledging. The post-fledging period is one of the most critical for raptors. It would be inappropriate to lift protection as soon as young fledge. It is also important to avoid construction in occupied territories just prior to egg-laying, when raptors are especially sensitive to disturbance.</p>	20000 - Monitoring, 28020 - Raptors/Eagles/Ravens, 35020 - Mitigation suggestions, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 46000 - Refers to Previously Submitted Comments, 48000 - Design Features

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101360	1	1	ELVIN LEO & UNA CLOYD	I = Individual (s) not affiliated	QC complete	In the past years working at Idaho Power and talking several times with Mr. Morley Nelson as they worked very close on the Birds of Prey Area, I feel he would agree the propose route would be the one to use. And I agree it would not involve devaluing us land owners property. My home on a small lot would kill us. Thank you for going the new red proposed route.	25030 - Property Values, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101368	1	1	PEGGY FRIDDLE	I = Individual (s) not affiliated	QC complete	I am not in favor of the lines coming through the proposed Segment 8 Route	50010 - Segment 8 – Applicants’ Proposed Route
101368	2	1	PEGGY FRIDDLE	I = Individual (s) not affiliated	QC complete	My family owns a farm that has been in the family since the early 1940's and putting another larger line 250 feet north of the excitisting one would just ruin several acres of farming acres plus causing a substantial devaluation of the farm.	25030 - Property Values, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing)
101368	3	1	PEGGY FRIDDLE	I = Individual (s) not affiliated	QC complete	Reports are by putting the lines South would ruin the habit of the Birds of Prey area. We have noticed the last few years ever so many birds that you would say their habit is south across the Snake River now are all around farms on the North side of the river.  As I recall years ago in Washington State the logging companies had to stop logging in many areas for the environments said it was destroying the habit of the White Owl. It was later discovered that the White Owl just moved to another area and very successfully continued to live and produce like always. The desert has been so dry for the last few years that is why we attribute the increase of all the hawks and occasionally Eagles in our fields for with the green vegetation come the rodents and smaller birds that these Birds of Prey feed on.  The Canyon County Noxious Weed & Gopher Control have made and placed 110 large bird houses on twelve foot high poles on farms and known nesting places to entice large birds to use as nesting houses.	28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101370	1	2	LONNIE AND LYNNE SVEDIN	I = Individual (s) not affiliated	QC complete	We fully support the proposed segment 8 route that the Regional Advisory Committee has proposed. This committee has spent many hours + thousands of dollars on deciding which route would best suit the BLM birds of prey, + the community of Melba / Kuna, + we fully support their final decision. Please do not change the route from the Morley Nelson Birds of Prey	50010 - Segment 8 – Applicants’ Proposed Route
101358	1	1	DUEY JOHNS	I = Individual (s) not affiliated	QC complete	I support the proposed sitting of the Power line going thru Strike Dam and the Birds of Prey. and back into Owyhee County to the substation.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101358	2	1	DUEY JOHNS	I = Individual (s) not affiliated	QC complete	The enhancement Fund should mostly go to habitat restoration along the Powerline route. The amount suggested for police protection is asinine, unless we now need 24 hours surveillance.	35030 - Applicants’ MEP (specific to NCA)
101359	1	1	ELIZABETH MATHEWS	I = Individual (s) not affiliated	QC complete	These lines should go where existing lines are currently, not across private lands in Owyhee County!	34010 - Private Land/Land Ownership, 50000 - Segment 8 General, 51000 - Segment 9 – General, 48000 - Design Features
101322	1	1	SCOTT NICHOLSON	I = Individual (s) not affiliated	QC complete	I agree with route 8	50000 - Segment 8 General
101323	1	1	TOM NICHOLSON	I = Individual (s) not affiliated	QC complete	For me the proposed Segment 8 route is by far the best route of all proposed. Please approve this route as soon as possible.	50010 - Segment 8 – Applicants’ Proposed Route
101324	1	1	C C & T LAND AND CATTLE,SCOTT NICHOLSON	I = Individual (s) not affiliated	QC complete	I would agree with route 8 + 9 would be the best route to go with.	50000 - Segment 8 General, 51000 - Segment 9 – General
101325	1	1	E KEITH HOAGLAND	I = Individual (s) not affiliated	QC complete	We need the farm ground to feed the people.	25060 - Agriculture, 34010 - Private Land/Land Ownership
101362	1	1	JAMES W BURCH	I = Individual (s) not affiliated	QC complete	I strongly agree with the recommendation of the Boise District Resource Advisory Council regarding the proposed segment 8 route for the powerline. I respectfully request that the proposed location of the routing through the Birds of Prey Area for Segment 8 be honored.	50010 - Segment 8 – Applicants’ Proposed Route
101288	6	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	the excuse that you can't run 2 power lines too close together in the NCA is bogus, since if you drive along I-84 in Oregon, you see no less than 5 power lines running parallel within a quarter mile of each other.	48000 - Design Features

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101286	1	2	TYLER RISEN,DEBBIE RISEN	I = Individual (s) not affiliated	QC complete	we approve of this proposed route through the Morley Nelson Birds of Prey NCA. We attended numerous meetings on the routing of Segment 8, which was originally proposed to run through our property next to our house. This would have been a financial disaster for us due to the negative effect on our property value (and probably on our health). The RAC has spent hundreds of hours and thousands of dollars reviewing the various routes and concluded that the best location would be to route Segment 8 through the NCA. Furthermore, the NCA already has similar power lines running through it. There is no evidence that these lines have affected wildlife in the NCA, but the effect on people who like us who live and own property along the previously proposed routes through private land would be devastating. PLEASE DO NOT CHANGE THE SEGMENT 8 ROUTE AWAY FROM THE NCA.	25030 - Property Values, 28000 - Wildlife (general), 34010 - Private Land/Land Ownership, 35000 - NCA/SRBOP (general), 41000 - Public Safety, 50010 - Segment 8 – Applicants’ Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101365	1	1	BEVERLY MORRIS	I = Individual (s) not affiliated	QC complete	WE are strongly for routing Segment 8 through Morley Nelson Birds of Prey - NCA. There is no need to look at any other routes and we approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location trough the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!	50010 - Segment 8 – Applicants’ Proposed Route
101363	1	1	SAMUEL ALLDREDGE	I = Individual (s) not affiliated	QC complete	Please do not change The Route from the NCA. The BLM Preferred Alternative or Deferred Decision Route is not what I would like to see happen. It runs to close to Kuna and our subdivision at Kuna Mora and Cloverdale. The Arrow Rock subdivision.	25020 - Housing, 50010 - Segment 8 – Applicants’ Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS, 51010 - Segment 9 – Applicants’ Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101364	1	1	RONALD MCMURRAY	I = Individual (s) not affiliated	QC complete	Do not change the route from the NCA. There is no need to look at other routes.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101366	1	1	ALICE & PAUL PLINE	I = Individual (s) not affiliated	QC complete	We totally agree with BLM decision to run the powerline on non irrigated ground 200 years from now people will thank you for your foresight to have [illegible].Run cattle & sheep on BLM ground - it is renewable resource, a tax base, fire prevention. Birds of prey only go where there is food + water, therefore we have them on our private cultivated ground 90% of the time.	25060 - Agriculture, 28020 - Raptors/Eagles/Ravens, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101367	1	1	BLACKSCREEK LIMITED PARTNERSHIP	B = Business or Business Group	QC complete	Route #8 is the only logical route of all the proposals. Please approve this route immediately.	50000 - Segment 8 General
101339	1	2	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I would like to see Idaho Power Expand and refocus their portfolio to meet guidelines recommended by the sub committee. I would also like to know why they did not accept these recommendations, for the mitigation and enhancement plan. I would also like to know if BLM thinks that the proposed recommended enhancement is adequate enough to meet the legislative requirements.	35010 - Enhancement requirements, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101339	2	2	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I fully support keeping all routes "off" of privately owned lands in Owyhee County.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50000 - Segment 8 General, 51000 - Segment 9 – General
101348	1	1	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I fully commend Idaho Power and Rocky Mountain Powers decision to accept the route proposed by the RAC subcommittee. But why didn't they accept their (RAC) recommendations about the mitigation and enhancement plans. Idaho Power needs to re-focus and expand their portfolio to meet the recommendations made by the RAC sub - committee.	35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101348	2	1	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	Also does BLM think that the legislative requirements will be met by the proposed enhancement.	35010 - Enhancement requirements
101348	3	1	LEE V & JANICE D HUMPHREY	I = Individual (s) not affiliated	QC complete	I fully support the proposed route made by the RAC sub-committee. This keeps all routes off of privately - owned land on Owyhee County.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route



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101349	1	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	I believe the latest revised proposed routes for segments 8 & 9 to be the best route. All parties involved have been [illegible] in determining the best routes, therefore this is the best route for everyone.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101349	2	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	There are [illegible] in the NCA. [illegible]	35000 - NCA/SRBOP (general)
101349	3	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	The new proposed route, at the [illegible] would provide much less [illegible] the sage grouse than the previous routes would [illegible]. There is a [illegible] in favor of the new proposed routes.	28070 - Sage-grouse
101334	1	1	DALE BABBITT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee (RAC) has proposed	50010 - Segment 8 – Applicants’ Proposed Route
101335	1	1	BASIN FERTILIZER AND FEED,ERIC CHILD	I = Individual (s) not affiliated	QC complete	I do not see any need to look at any other routes and I approve the proposed segment 8 route that the REgional Advisory Committee ahs proposed. The RAC has spend hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through th eNCA. And I would ask that you do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101336	1	1	C T PROPERTIES LLC,ROBINSON R I HONEY CO INC,RICHARD C WILLIAMS	I = Individual (s) not affiliated	QC complete	I do not see any need whatsoever to look at any other routes, I do strongly approve the proposed Segment 8 route that the Regional Advisory Council (RAC) has proposed. They have spent countless hours and dollars in reviewing the alternative routes and have concluded the proposed location through the NCA.  It is strongly requested you DO NOT change the route from the NCA. This route will eliminate millions of dollars of economic damage to our great state if prior alternative routes were selected.	25000 - Socioeconomics, 50010 - Segment 8 – Applicants’ Proposed Route, 58000 - General project effects on State (Idaho)
101337	1	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 1) The route will not interfere with the Historic Old Oregon Trail + surrounding area rated VRM II.	23000 - Visual Resources, 24010 - Historic Trails, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101337	2	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 2) The present route is more direct with fewer corner towers, which are more expensive to install.	25000 - Socioeconomics
101337	3	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 3)The installation of the towers would be easier to accomplish without having to traverse canyons and undulating land associated with these. Roadway emplacement for access to erect transmission line structure and maintenance and upkeep would be easier.	31000 - Geologic Hazards, 34000 - Land Use, 38000 - Transportation
101337	4	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 4) The proposed routing would not be invasive to irrigation or farming practices.	25060 - Agriculture
101337	5	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 5) The older proposed routing would cause constance interference with the reception or radio and television transmissions.	40000 - Electrical Environment
101337	6	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 6) The previous proposed routing would have been placed over our home. With present proposed change this problem would be eliminated.	34010 - Private Land/Land Ownership
101337	7	1	PATSY ANDERSON	I = Individual (s) not affiliated	QC complete	The proposed route of the transmission line between mileposts 35 to 42 is more reasonable than the older route proposed due to the following reasons: 7) There would be less area to reclassify.	25050 - Community/city development and expansion, 34020 - County and City Plans/Zoning
101320	1	2	JAMES AND MARYANN SLEGERS	I = Individual (s) not affiliated	QC complete	We feel very strongly there is no need to further explore other routes tht the Regional Advisory Committee (RAC) has proposed. The RAC has spent	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route



Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
						hundreds of hours and thousands of dollars in reviewing various routes and concluded that the proposed location through the NCA is he BEST option. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!	
101321	1	1	SCOTT NICHOLSON	I = Individual (s) not affiliated	QC complete	I strongly encourage you to go with route 8 & 9	50000 - Segment 8 General, 51000 - Segment 9 – General
101285	1	1	DUANE YAMAMOTO	I = Individual (s) not affiliated	QC complete	I am strongly in favor of the route proposed by the Regional Advisory Committee for Segment 8. The proposed route will have the least amount of impact on the cities of Kuna and Melba as well as nearby farmers. It will also be the most cost effective in terms of litigation, easements and "buy-outs". For power companies to be able to transfer power from other sources in emergencies and regulate usage at peak or slack times is an added plus.	16000 - Generally support project, 25060 - Agriculture, 34020 - County and City Plans/Zoning, 50010 - Segment 8 – Applicants’ Proposed Route
101287	1	2	JAMES WELLS,THERESA WELLS	I = Individual (s) not affiliated	QC complete	We feel there is no need to look at any other routes as we approve the proposed Segment 8 route that the RAC has proposed! The previous route would have run the power lines directly above our home at the address stated above. With our current medical conditions and both being completely disabled it would make it impossible for us to remain in our home and very difficult for us to move! The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA! Any further correspondence can be done through the above names and address.	50010 - Segment 8 – Applicants’ Proposed Route
101288	1	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	I SUPPORT the RAC subcommittee's proposed route for Segment 9 that runs through the Morley Nelson Snake River Birds of Prey National Conservation Area. I SUPPORT enhancement for the NCA. I OPPOSE any route that goes through the Owyhee foothills and towns of Oreana, Grand View and Bruneau.	27040 - Native vegetation, 35010 - Enhancement requirements, 51010 - Segment 9 – Applicants’ Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101288	2	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	it has not yet been illustrated nor proven that this extra line is even necessary	11000 - Purpose and Need for the Project, 17000 - Generally oppose project
101288	3	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	the sagegrouse habitat will be disturbed with routes through the Owyhee foothills and the Oreana surroundings, while the RAC's recommended route through the Snake River Birds of Prey National Conservation Area will benefit raptors, and will destroy less land, since there is already a power line there,	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse
101288	4	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	there are some possible Native American archaeological sites that have not been addressed along the Owyhee front in the Oreana area that could be affected by a power line that have not been addressed	24000 - Cultural Resources
101288	5	1	MERRI MELDE	I = Individual (s) not affiliated	QC complete	the scenic and remote Owyhee front is one of Idaho's treasures. Once you demolish a fragile desert landscape with construction and heavy equipment, it doesn't completely recover.	23000 - Visual Resources
101369	1	1	JOHN E FUQUAY	I = Individual (s) not affiliated	QC complete	Lines should go through birds of prey where existing lines are NOT through private land in Owyhee County.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101333	1	1	BOYD & LOA ANDERSON LP,BOYD ANDERSON	I = Individual (s) not affiliated	QC complete	We strongly encourage you to take the recommendation for segment 8 as proposed by the Regional Advisory Committee and not go through private property!	34011 - Site the line on public land, 50010 - Segment 8 – Applicants’ Proposed Route
101265	1	1	DON ROBERTS	I = Individual (s) not affiliated	QC complete	I support the Agency Preferred Alternate Route, FEIS Alternative Route - Alternative 8B-, the route marked as green/black. Any other options just serves to damage the fragile BOP even more than what the public and the Military is already doing out there. All those gravel trucks that run up and down Pleasant valley road on a daily basis is coating the area on either side of the desert in a thick layer of dust. What going to happen if the existing power line is modified? Even more damage.	27000 - Vegetation, 50020 - Segment 8 – Routes considered in the 2013 FEIS

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101229	1	1	DOUGLAS TEATER	I = Individual (s) not affiliated	QC complete	As a Southern Idaho native and property owner within the Segment 8 route study area, I strongly encourage the BLM to route Segment 8 through the Morley Nelson Birds of Prey – NCA as proposed by the Regional Advisory Council. It is my understanding that this route has been agreed to by Idaho Power, Rocky Mountain Power and the Bureau of Land Management. Further, the Regional Advisory Council has invested hundreds of hours and thousands of dollars reviewing the impacts of route options, and has also concluded that the best and proper route is through the NCA. I STRONGLY URGE THE BLM TO STAND FIRM ON ROUTING SEGMENT 8 THROUGH THE NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101315	2	1	DEANNA LEWIS	I = Individual (s) not affiliated	QC complete	PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA!!!	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101267	1	1	MATTHEW E AND JEAN M BARNEY	I = Individual (s) not affiliated	QC complete	I wish to express my support for the proposed Segment 9 Alternative through the Snake River Birds of Prey National Conservation Area. I believe this is the segment marked 9D/F/G/H on the project map. Karen Steenhoff, my friend and a raptor specialist, has explained how this route would actually benefit raptors in the area, rather than harming them. Also there is plenty of evidence of human use in the SRNCA, including power lines that run through the area.	28020 - Raptors/Eagles/Ravens, 51010 - Segment 9 – Applicants’ Proposed Route
101267	2	1	MATTHEW E AND JEAN M BARNEY	I = Individual (s) not affiliated	QC complete	I believe Segment 9E would decimate a large population of Greater Sage Grouse that breed near the proposed route. Based on the most recent project map, it appears that Segment 9E would pass through, or come very near to, an active lek in the vicinity of T4S, R2W, S35. To my knowledge, this is one of Idaho's largest leks. I have observed as many as 50 strutting Sage Grouse cocks at one time on this lek during my frequent April visits over the past 15 years. I believe construction of Segment 9E will destroy the lek, leading to the demise of the local population in a short time. With grouse already under extreme pressure to survive, I find this completely unacceptable. I believe Segment 9E would do significant damage to the human experience of being on the eastern Owyhee Front. To me it is a place of refuge and solace, a place to get away from the city, yet not too far to drive in a day. I can go out there and not see any sign of people for hours or even days if I pick the right spot. There are few signs of human development on the land and those are easy to overlook. Many of the roads aren't much more than wide trails. The only "improvements" are grazing allotment fences, far apart and often hidden by the land, and the occasional old wooden corral tucked into a canyon. When I am out there I feel in awe of the mighty forces that shaped the dramatic scenery--forces far beyond human control. I continue to be surprised by the tenacity and beauty of the unique plants and animals that flourish in that harsh landscape--a landscape that has (so far) defeated human efforts to tame it. The experiences I've had in that natural landscape have profoundly changed me as a person, for the better. A transmission line would be a very visible and unwelcome intrusion.	23000 - Visual Resources, 28070 - Sage-grouse, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101346	1	1	PG MAC INC	I = Individual (s) not affiliated	QC complete	I approve the proposed segment 8 route that the Regional Advisory Committee (RAC) has proposed.	50010 - Segment 8 – Applicants’ Proposed Route
101327	1	1	LAVAR THORNTON	I = Individual (s) not affiliated	QC complete	I strongly agree with their recommendation for the transmission line to go through the NCA.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101327	2	1	LAVAR THORNTON	I = Individual (s) not affiliated	QC complete	I would be seriously impacted by the original route as it goes through some of my farmland .	34010 - Private Land/Land Ownership
101328	1	1	LEONARD LOPER	I = Individual (s) not affiliated	QC complete	The route from the NCA will be fine - please do not change it.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101319	1	1	PERRY MCCORMACK	I = Individual (s) not affiliated	QC complete	There is NO need to look at any other routes and I approve the proposed segment 8 route that the regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing	50010 - Segment 8 – Applicants’ Proposed Route

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						various routes and concluded on the proposed location through the N.C.A. "PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA."	
101329	1	1	SCHROEDER & LEZAMIZ LAW OFFICES, LLP, EDITH NETTLETON TESTAMENTARY TRUST	I = Individual (s) not affiliated	QC complete	I APPROVE the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed.	50010 - Segment 8 – Applicants’ Proposed Route
101311	1	2	SCOTT & ZOEANN GREENFIELD	I = Individual (s) not affiliated	QC complete	I agree and approve the proposed segment 8 route that the Regional Advisory Committee has proposed. This route has been reviewed and been determined to have the least amount of economic and environmental impact for everyone involved.	25000 - Socioeconomics, 50010 - Segment 8 – Applicants’ Proposed Route
101312	1	1	DAVID BRADSHAW	I = Individual (s) not affiliated	QC complete	I approve the proposed route that the Regional Advisory Committee has proposed.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101314	1	1	STACY LUNDERS	I = Individual (s) not affiliated	QC complete	I approve the segment 8 route that the Regional Advisory Committee has proposed.	50010 - Segment 8 – Applicants’ Proposed Route
101315	1	1	DEANNA LEWIS	I = Individual (s) not affiliated	QC complete	Why would you consider going through private property where we live.	34010 - Private Land/Land Ownership
101316	1	1	REESE LEAVITT	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101317	1	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	As I understand this Gateway West Transmission Line project, it could be located 250 feet north of Summer Lake. The would totality wipe out three of our existing pivots, + ruin irrigation land. These pivots cost over \$100,00 each.	25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing)
101317	2	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	In addition, it would come very close to two of our existing homes.	34010 - Private Land/Land Ownership
101326	1	1	SHERRY AGNEW	I = Individual (s) not affiliated	QC complete	1) Too close to a city impact area in my mind is adverse to a continued growth pattern in the Kuna Area.	25050 - Community/city development and expansion, 34020 - County and City Plans/Zoning
101347	1	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS, JOE MERRICK, VERLA MERRICK	I = Individual (s) not affiliated	QC complete	We are in favor of the revised application and routes proposed by the Power Companies and the RAC.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101347	2	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS, JOE MERRICK, VERLA MERRICK	I = Individual (s) not affiliated	QC complete	Placing the power lines through the BOPNCA will have less of a negative impact on private property and can have a great advantage on the already fragmented habitat in the NCA.	28010 - Habitat Fragmentation, 34010 - Private Land/Land Ownership, 35000 - NCA/SRBOP (general)
101347	3	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS, JOE MERRICK, VERLA MERRICK	I = Individual (s) not affiliated	QC complete	The Enhancement Package proposed by the power companies is lacking in funding and the designation of funds needs to support the reestablishment of the landscape that supports the viability of the raptor population for which the NCA was established.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101347	4	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS, JOE MERRICK, VERLA MERRICK	I = Individual (s) not affiliated	QC complete	The enhancement package should be used to that end and not for removing power lines, purchasing property, law enforcement, or public education.	35040 - Recommendations for MEP changes
101347	5	2	OWYHEE COUNTY, BOARD OF COMMISSIONERS, JOE MERRICK, VERLA MERRICK	I = Individual (s) not affiliated	QC complete	The proposal for the power line lease is for 30 years and the Enhancement Package should be for that amount of time and beyond, not for only 10 years as proposed.	35040 - Recommendations for MEP changes
101313	1	1	PATRONS OF HUSBANDRY,	S = Special Interest Group	QC complete	There is no more grange or Patrons of Husbandry in Melba so you need not send any more info to us-	10010 - Out of scope comments
101350	1	2	FRISCH FARMS, KEN FRISCH, GARY FRISCH	I = Individual (s) not affiliated	QC complete	both proposed line routes go through farm ground which devalues the ground and negates any future installation of pivot irrigation systems.	25030 - Property Values, 25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101350	2	2	FRISCH FARMS, KEN FRISCH, GARY FRISCH	I = Individual (s) not affiliated	QC complete	Can you show us studies that without a doubt prove that peoples health is not affect by higher voltage line who live and work directly under them.	40000 - Electrical Environment, 41000 - Public Safety
101350	3	2	FRISCH FARMS, KEN FRISCH, GARY FRISCH	I = Individual (s) not affiliated	QC complete	To us the deferred route to the south is the most reasonable. If the concern is over the impact on wildlife, what is more important, wildlife or food and industrial producing humans. Wildlife have been adapting for hundreds of years, you read and hear on the news about various wildlife coming into the heavily populated areas of Boise every year. We have game birds running across our yards all summer long.	28000 - Wildlife (general), 51000 - Segment 9 – General

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101318	1	1	TOM KELLY	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee has proposed, The RAC has spent hundred of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THR ROUTE FROM THE NCA	50010 - Segment 8 – Applicants’ Proposed Route
101345	1	1	GORDON L & NANCY A THOMPSON	I = Individual (s) not affiliated	QC complete	Segment 8 Application proposed is the best route to take. All impact has already be made with the first line on old line. The new line could be stack on the old line for less impact. Beside would be ok. Segment9 take in a completely new impact.	50010 - Segment 8 – Applicants’ Proposed Route, 51000 - Segment 9 – General
101341	1	1	MERLE AND LINDA CARLSGAARD	I = Individual (s) not affiliated	QC complete	The proposed Segment 8 is the best option and there is no need to look further. Even the Regional Advisory Committee has proposed this route. It is shorter and has less impact on private properties. With the proper installation Birds of Prey will have minimal impact on there well being. The shorter route will use less materials hense the consumer will not have as big of a impact in there power bills.	25000 - Socioeconomics, 28020 - Raptors/Eagles/Ravens, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route
101343	1	1	ROBERT NETTLETON	I = Individual (s) not affiliated	QC complete	There is not need to look at any other routes and I APPROVE the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spend hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101344	1	1	GREGORY SANCHEZ	I = Individual (s) not affiliated	QC complete	approve the proposed Segment 8 Route that the RAC proposed. this has been a long process with many hours invested - please accept this proposed route without making further changes.	50010 - Segment 8 – Applicants’ Proposed Route
101326	2	1	SHERRY AGNEW	I = Individual (s) not affiliated	QC complete	2) Also I have attended many of these meetings and feel Idaho Powers contribution to the stabilization of any ill effects to raptors and /or their habitat makes it conceivable to Route South of the Morley Nelsen's Snake River Birds of Prey NCA areas, possible without harm.	28020 - Raptors/Eagles/Ravens, 51020 - Segment 9 – Routes considered in the 2013 FEIS, 51030 - Segment 9 – RAC Route Options
101317	3	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	Summer lake Transmission already crosses over one mile of our property. Why wouldn't it be possible to install this new line over the tip of Summer Lake? We will do whatever we can to oppose this 250 feet North Route.	50010 - Segment 8 – Applicants’ Proposed Route, 48000 - Design Features
101342	1	1	LEONARD & MARY LOPER	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101257	1	1	HAROLD RAY TABOR	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route RAC has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101249	1	1	BURL J SMITH	I = Individual (s) not affiliated	QC complete	There is no need to look @ any other routes - + I approve the proposed segment 8 route that the reginal advisory committee has proposed - Do not spend any more time or money on the project! Please do not change the route from the NCA!	50010 - Segment 8 – Applicants’ Proposed Route
101272	1	1	RICHARD FRIDDLE	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the segment 8 route that the Regional Advisory Committee has proposed Please do not change the route from the NCA	50010 - Segment 8 – Applicants’ Proposed Route
101281	1	1	DONALD HAMILTON	I = Individual (s) not affiliated	QC complete	I strongly oppose routing segments 8 (eight) across private ground when public land, the Birds of Prey Area, is available. The M Nelson birds of Prey already has high tension PowerLines running across it. This "Gateway Project" is supposedly for "The Public Good." Let it be built on the "Public's" lands. There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee has proposed. The RAC spent thousands of hours + thousands of dollars on this various routes and concluded on the ROUTE through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 50010 - Segment 8 – Applicants’ Proposed Route



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101282	1	1	WILLIAM A BERRY	I = Individual (s) not affiliated	QC complete	Theres no need to look at other routes. I approve of the proposed segment 8 route that the RAC has proposed. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101283	1	1	JOYCE BURCH	I = Individual (s) not affiliated	QC complete	The RAC proposed routes for Segments 8 and 9 are the correct choice and there is no reason to look at any other routes. Enough time and money has already been spent reviewing various routes and the decision the committee reached, going through the NCA is best for all concerned. Please do not change the route from the NCA, as proposed by the RAC.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101284	1	0	DON ROBERTS	I = Individual (s) not affiliated	QC complete	My question is about segment number eight and it looks like that's going actually through our property and it's hard to understand the maps. I'm hoping to talk to a human to try to figure out what the heck I'm looking at here. Uhh, please give me a call 287-9846.	34010 - Private Land/Land Ownership, 50000 - Segment 8 General
101280	1	1	BETTY HAMILTON	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours + thousands of dollars and reviewing various routes and concluded on the proposed location through the NCA. Please DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101279	1	1	WENDY CORNWELL	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed Segment 8 route that the RAC has proposed. The RAC has spent hundreds of hours & thousands of dollars in reviewing various routes & concluded on the proposed locations through the NCA. Please don't change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101274	1	1	EVELYN RAE GRIMES	I = Individual (s) not affiliated	QC complete	I strongly encourage you to look at only the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. I approve this proposed 8 segment. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101275	1	1	RICHARD BRANDAU	I = Individual (s) not affiliated	QC complete	I am in favor of the August 8, 2014 revised application for segments 8 and 9 of the Gateway West Transmission Line Project, which incorporate routing options evaluated by the Regional Advisory Council. I support the position of the Owyhee County Board of Commissioners, the RAC, the Owyhee County Natural Resource Committee, and the Owyhee County Citizens Task Force. There is no need to look at any other routes and I approve Segment 8 & 9 as submitted in the August 8, 2014 revised application. Keeping the transmission lines in the August 8, 2014 proposed Segments 8 & 9 corridor makes the best sense. I am 67 years old and have lived here my whole live. I saw the construction of the existing 500KV Pacific Power and Light line during the 1970' s. I've seen its' impacts, both positive and negative and the positives outweigh the negatives. There will be fewer negative impacts if Segments 8 & 9 is approved.	16000 - Generally support project, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101276	1	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	I am in favor of the August 8, 2014 revised application for segments 8 and 9 of the Gateway West Transmission Line Project (which incorporate routing options evaluated by the Regional Advisory Council) and the proposed MEP submitted by "the proponents".	35030 - Applicants’ MEP (specific to NCA), 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101276	2	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Please do not diminish the value of the time, work, and efforts put forth by "the proponents" of the MEP. The "proponents" of include citizens of Owyhee County who have many vested interests, the most precious of which are their private property rights. Keeping the transmission lines on the BOPNCA would mean less negative impact to private property fewer linear miles of line to construct	34010 - Private Land/Land Ownership



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101276	3	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines in the BOPNCA to avoid sage grouse habitat and placing a predator species in closer proximity to a potentially endangered species.	28070 - Sage-grouse, 35000 - NCA/SRBOP (general)
101276	4	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines it in the BOPNCA avoid having to an1end numerous BLM land use plans.	34030 - Federal land Use Plans
101276	5	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines in the BOPNCA because data supports the benefit of existing lines already sited in the NCA as beneficial to raptors.	28020 - Raptors/Eagles/Ravens
101276	6	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean fewer linear miles of transmission line to construct.	25000 - Socioeconomics
101276	7	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean that roads to access the construction area are already in place (Baja-east side of Snake River from Swan Falls to Grand View) as opposed to all new road through sage grouse habitat on the West side of the Snake River.	38000 - Transportation
101276	8	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean less negative impact to the historic areas of Owyhee County: Guffy, Murphy, Silver City, Sinker Creek, Oreana, Castle Creek, Grand View, Bruneau, the Bruneau River, Bruneau Sand Dunes, Hot Springs, and this entire segment of the Oregon Trail.	24000 - Cultural Resources, 24010 - Historic Trails
101276	9	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would mean that there would be fewer and less intense water quality issues related to construction. As a 10 year plus member of the Mid-Snake Succor Creek Water Shed Advisory Group, I am aware that there are numerous perennial and ephemeral creeks, canyons, and drainages that enter the Snake River from the Owyhee Breaks on the west that would have to be crossed and few (if any) that enter from the BOPNCA and the Kuna desert on the east.	27030 - Wetlands/Riparian vegetation, 33000 - Water Resources and Use
101276	10	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	Keeping the transmission lines on the BOPNCA would avoid winter feeding habitat areas for mule deer, antelope, mountain sheep, and wild horse herds as identified by various Idaho agencies. There are more species of concern (SC) and sensitive species (SS) in the Deferred Decision areas in Owyhee County than there are in the proposed routes Segment 8 & 9.	28000 - Wildlife (general), 28030 - Big Game/Winter Range, 28060 - Other Special Status Wildlife
101276	11	1	CONNIE BRANDAU	I = Individual (s) not affiliated	QC complete	A positive economic impact to our budding Idaho industries is dependent on the availability to access electrical power. Good, sound, long term planning is necessary to make that access possible. It stands to reason that the closer the power is to developed areas the more the public will benefit and the less the cost to them will be. There is great potential for green energy production (wind, solar, and hydro) along the Snake River Canyon in Idaho. The August, 2014 revised application for Segments 8 & 9 would keep the transmission lines in an area that would allow more convenient and lest costly access to that type of power production. Keeping the transmission lines in the August 8, 2014 proposed Segments 8 & 9 corridor makes the best sense.	16000 - Generally support project, 25050 - Community/city development and expansion
101278	1	1	JAMES SCHOFIELD	I = Individual (s) not affiliated	QC complete	My property backs up the BLM Land and my concern is my view of the Owyhee desert will be impacted. The view of the canyons and buttes was a huge reason for selecting my property, (of course nobody informed me of the possibility of such a transmission line). My hope is to not have it to the west of my property. However, should it get built, please locate it as far west as Kane Spring Road to reduce the visual impact.	23000 - Visual Resources
101223	1	2	ANTHONY MILLER,TERRY MILLER	I = Individual (s) not affiliated	QC complete	Enough time and resources have been expended on this project. The proposed segment 8 route is the sensible course of action. For the good of the local economy and the people you serve approve it and move on.	25000 - Socioeconomics, 50010 - Segment 8 – Applicants’ Proposed Route
101250	1	1	GARLAND HOUSLEY	I = Individual (s) not affiliated	QC complete	Leave the transmission Line project as proposed through the morley nelson Bird of prey	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route

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101230	1	2	SHARON STRICKLAND,RICHARD STRICKLAND JR	I = Individual (s) not affiliated	QC complete	Why are BOTH Segment 8 and Segment 9 necessary? It appears that this is simply placing two lines across the same distance, where one line is proposed in other areas. We recommend Segment 9 and Alternative 9E that take the line across mostly public land, where the least amount of private residences would be affected.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101230	2	2	SHARON STRICKLAND,RICHARD STRICKLAND JR	I = Individual (s) not affiliated	QC complete	If Segment 8 MUST be included, then we urge the BLM to consider Alternative 8A, where less private land would be impacted; there is an existing corridor already in existence on 8A that runs south of the Shoestring Road, and there would less disturbance to golden eagles and owls in the 8A alternative.	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101230	3	2	SHARON STRICKLAND,RICHARD STRICKLAND JR	I = Individual (s) not affiliated	QC complete	Regarding your responses to our comments made on the Final EIS: As we previously stated, there is an old transmission line that runs approximately 1/4 mile south of our home. Placing another line there with 160-180ft towers will lower our property values. You stated that because the line will run south of the present line and we are on the north, there would be less visual impact. Just what is the definition of "less" - ? The visual impact difference would be minimal at best. And to the person who made the snarky comment that none of the 1500 observation points were on our porch, we invite you to come and see for yourself just what a visual impact (and consequential loss in property value) we will suffer if Segment 8 is approved as proposed.	23000 - Visual Resources, 25030 - Property Values, 50000 - Segment 8 General
101221	1	1	JOHN FRIEDENREICH	I = Individual (s) not affiliated	QC complete	I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC does not need to spend additional time or money to review any other route options. Please do not change the route from the NCA for Segment 8.	50010 - Segment 8 – Applicants’ Proposed Route
101256	1	1	RONALD WRIGHT	I = Individual (s) not affiliated	QC complete	There is no need to look at any other routes and I approve the proposed segment 8 route that the regional advisory committee has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101258	1	1	KLAR LLC,KELLY MANN	I = Individual (s) not affiliated	QC complete	Please do not change the route from the NCA. I agree with the preferred routes from segments 8 and 9 as proposed.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101247	1	1	RICHARD KERSHNER	I = Individual (s) not affiliated	QC complete	The line North of Orchard, Owyhee, Melba and South of Kuna is not wownted at all.	50020 - Segment 8 – Routes considered in the 2013 FEIS
101247	2	1	RICHARD KERSHNER	I = Individual (s) not affiliated	QC complete	The line North of Orchard and South of Owyhee, Melba Kuna is ok.	50010 - Segment 8 – Applicants’ Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101247	3	1	RICHARD KERSHNER	I = Individual (s) not affiliated	QC complete	The other 2 Lines south of these 2 are ok.	51010 - Segment 9 – Applicants’ Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101251	1	1	ANNA ROGERS	I = Individual (s) not affiliated	QC complete	Please do not change the route from The NCA. The RAC has spent many hours and thousands of dollars reviewing various routes & concluded on the proposed location through the NCA. There is no need to look at any other routes. I approve the proposed segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants’ Proposed Route
101260	1	2	JERRY SWORD,RAMONA SWORD	I = Individual (s) not affiliated	QC complete	My wife and I approve the proposed segment 8 route that the RAC has proposed. We feel there is no need to look at any other routes. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and have concluded on the proposed location through the NCA. Please do no change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101222	1	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Proposed route alterations currently under consideration involve additional alternatives in southwestern Idaho, but as the BLM is reopening the NEPA process, the agency should also consider route alternatives in western Wyoming to avoid the sage grouse Core Area north of Kemmerer, and instead carry the line westward along Interstate 80 until reaching the Utah border.	10000 - Conformance with the NEPA process, 18000 - Comments on segments 1 to 7 & 10, 28070 - Sage-grouse
101222	2	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	In addition, BLM notes that WECC has relaxed its offset requirements for other power lines to 250 feet; this applies across the entire length of the proposed new line, and it is a reasonable alternative to revisit each and all of	10000 - Conformance with the NEPA process, 13000 - Use of/ Failure to use designated corridors, 18000 - Comments on segments 1 to 7 & 10, 50010 - Segment 8

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						the segments to ensure that new powerlines are sited as close as possible to existing transmission lines.	– Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101222	3	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	According to BLM policy, the agency must consider in detail under at least one alternative the science-based recommendations of the agency’s National Technical Team (“NTT,” 2011) in these plan revisions. The NTT recommended that sage grouse Priority Habitats be treated as exclusion zones for overhead transmission lines, and this recommendation should be implemented throughout the length of the Gateway West transmission corridor.	10000 - Conformance with the NEPA process, 18000 - Comments on segments 1 to 7 & 10, 28070 - Sage-grouse, 50010 - Segment 8 – Applicants’ Proposed Route, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101222	4	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Braun et al. (2002) reported that 40 leks with a power line within 0.25 mile of the lek site had significantly slower population growth rates than unaffected leks, which was attributed to increased raptor predation. Dinkins (2013) documented sage grouse avoidance of powerlines not just during the nesting period but also during early and late brood-rearing. Wisdom et al. (2011) also documented strong relationships between grouse lek extirpation and proximity to transmission lines. In other sage grouse plan amendment DEISs, BLM has documented negative effects to 4 miles from powerlines and beyond.	28070 - Sage-grouse
101222	5	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Simply requiring perch inhibitors to be installed on powerlines is not an adequate regulatory mechanism (see Prather 2010, Lammers and Collopy 2007); such perch deterrents reduce, but do not eliminate, raptor perching (Slater and Smith 2010). Notably, it was golden eagles and ravens, two of the most important sage grouse predators and nest predators, respectively, that most effectively circumvented powerline perch inhibitors in this study.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse, 48000 - Design Features
101222	6	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	We are concerned that large-scale transmission lines such as this one are detrimental to greater sage grouse through providing roosting and nesting opportunities for corvids and birds of prey that are sage grouse predators and/or nest predators, by triggering behavioral avoidance of otherwise suitable habitats, and by presenting direct mortality hazards through collisions. For these reasons, transmission lines should not be allowed in or even near identified Priority Habitats or Priority Areas for Conservation (PACs). A two-mile buffer from these sensitive sage grouse habitats should effectively minimize the impacts of this project on greater sage grouse.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse
101222	7	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	We are also concerned that the cumulative impact of numerous powerlines and highways taken together may come to form a barrier to sage grouse migration and dispersal. Please determine through your NEPA analysis whether current or cumulative densities of infrastructure are already or will with the future addition of this transmission line present a barrier to sage grouse movement.	10000 - Conformance with the NEPA process, 28070 - Sage-grouse, 43000 - Cumulative Effects
101222	8	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	Sage grouse have little tolerance for interstate highways (Knick et al. 2013). Along Interstate 80 in Wyoming and Utah between 1970 and 2003, observers found no leks within 2 km (1.25 mi) of the interstate and fewer birds on leks within 7.5 km (4.7 mi) than within 7.5–15 km (4.7–9.3 mi) beyond the interstate (Connelly et al. 2004). According to BLM’s own NEPA analysis: Impacts on GRSg accrue over varying distances from origin depending on the type of development: - Interstate highways at 4.7 miles (7.5 kilometers) and paved roads and primary and secondary routes at 1.9 miles (3 kilometers) based on indirect effects measured through road density studies (Connelly et al. 2004; Holloran 2005; Lyon 2000) Nevada – Northeastern California Greater Sage-grouse RMP Amendment DEIS at 605. BLM should give serious consideration to locating all transmission line segments within 4.7 miles of interstate highways for this reason.	28070 - Sage-grouse, 38000 - Transportation
101222	9	1	WILDEARTH GUARDIANS,ERIK MOLVAR	S = Special Interest Group	QC complete	It is critically important that BLM consider in detail the best available science regarding minimizing the impacts of siting this transmission line on sage grouse. Please procure and analyze in detail each of the scientific studies	10000 - Conformance with the NEPA process, 45000 - Literature Used/Not Used

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						referenced in the Literature Cited section of these comments and incorporate them into the analysis of direct and cumulative impacts in the Supplemental Draft EIS.	
101255	1	1	DANA HENNIS	I = Individual (s) not affiliated	QC complete	I approve the proposed segment 8 route that the regional advisory committee has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101224	1	1	DAVID L PALFREYMAN	B = Business or Business Group	QC complete	After attending several public hearings and providing input, I strongly support the proposed Segment 8 route that the Regional Advisory Committee has proposed. Much time and expense has been expended in reviewing multiple alternative routes. I feel strongly that the proposed location through the NCA is right for all parties. Please do not change the NCA route.	50010 - Segment 8 – Applicants’ Proposed Route
101239	1	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	This document provides the Owyhee County Idaho Scoping Comment on the Gateway West Segments 8 and 9. GENERAL COMMENTS: We are pleased that the cunent proposed routings of the two segments are the routings developed and supported by the RAC Subcommittee. We believe the best alternatives for the two segments are those routes.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101239	2	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	We are disappointed in the failure of the power companies to adopt the Mitigation and Enhancement Portfolio developed by the RAC Subcommittee. The RAC Subcommittee looked carefully at the proposed Mitigation and Enhancement from the perspective of what was required to make the routes through the NCA workable in terms of both the legislative/regulatory requirement of the NCA and the possible opposition from various interest groups. That the companies failed to fully adopt the Subcommittee's work, we believe, places the project in jeopardy. We will contact Idaho Power directly to voice our concerns on this important matter.	12000 - Relationships to other federal laws and policies, 35020 - Mitigation suggestions, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	3	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	1. The Record of Decision issued by the BLM in November 2013 called upon BLM to evaluate and refine the Mitigation and Enhancement plan to ensure that it is sufficient to meet the enhancement requirements of the legislation that designated the BOPNCA. To authorize a right-of-way (ROW) under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that an enhancement program will result in a net benefit to the NCA for the duration of the permit (PL 1 03-64). The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation.	12000 - Relationships to other federal laws and policies, 35000 - NCA/SRBOP (general), 35010 - Enhancement requirements, 35030 - Applicants’ MEP (specific to NCA)
101239	4	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	2. There are various statements in the proposal which are misleading or erroneous in regard to impacts on either the " ... values for which the NCA was designated ... " (Pages 6 and 18, for example) or on the impacts to rap tors (page 18 for example). The RAC Subcommittee analysis did not indicate "no impacts" but rather indicated where the lines could be located with minimized impacts through mitigation and enhancement. Statements indicating "no impacts" are not only incorrect, they also offer easy wins for opposition groups if the proposed route is litigated.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants’ MEP (specific to NCA)
101239	5	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	3. The Companies' mitigation and enhancement portfolio, has been reviewed by the RAC Subcommittee which prompted numerous suggested improvements. The version reviewed by the Subcommittee was not the final version submitted by the Companies, however, the RAC Subcommittee	35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes



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						proposals were not adopted by the Companies and the version submitted does not address or mitigate the issues raised by the RAC Subcommittee.	
101239	6	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	. The Companies used a formula for calculation of mitigation which is apparently a common practice in the industry. However, "Enhancement" is unique to the Birds of Prey NCA and is not the same as "mitigation." Calculating "enhancement" for the Birds Of Prey NCA is likely the first instance of such a calculation in the planning or a transmission line route. The current enhancement package is weak and, if uncorrected, will be the fail point of the proposed routes.	35010 - Enhancement requirements, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	7	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	5. Included in the Portfolio is the purchase of property to protect cultural resources. This purchase is unnecessary and contrary to the stated goals of Owyhee County, and other rural counties, to maintain the current acreage of land in private ownership vs seeing private lands (which support the county tax base) to be transferred to federal ownership.	24000 - Cultural Resources, 34010 - Private Land/Land Ownership, 34020 - County and City Plans/Zoning, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 25040 - Taxes/Taxpayers, 57000 - General project effects on Counties
101239	8	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	6. The proposed habitat improvements are limited in acreage and will be of limited benefit. They are inadequate in both the dollar amounts and the proposed projects. Enhancements should be planned at the landscape level to be effective.	27000 - Vegetation, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	9	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	7. Current portfolio contains public education. BLM is already fully engaged in such public education as are groups such as the Peregrine Foundation. This duplication of effort will bring little improvement and is a waste of funds better spent elsewhere	35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes
101239	10	3	OWYHEE COUNTY,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	G = Government	QC complete	8. The Companies' enhancement package proposes a myriad of various projects without demonstrating how standards of enhancement will be met during the life of the project. 9. Funds currently proposed in the portfolio for education and land purchase should be used for more effective enhancement projects as noted in the Subcommittee report. 10. A simple, low cost study should be completed to determine the cost savings of the proposed segments 8 and 9 routes to clearly show the economic benefits to the companies that occur from routes through the NCA where roads and other infrastructure are already present. The study should include the cost savings obtained where roads exist, thus eliminating easement access, applications costs, and construction. 11 . Once the potential savings are known, a more reasonable and viable Mitigation and Enhancement Portfolio can be developed. The enhancement package should not be punitive but must meet the standards of the legislation for the BOP NCA.	25000 - Socioeconomics, 35030 - Applicants' MEP (specific to NCA), 35040 - Recommendations for MEP changes, 38000 - Transportation
101240	1	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	We officially would like to express our gratitude to the BLM for deferring their decision regarding segments 8 & 9 of the Gateway West Transmission Line Project. We diligently attended the 11 RAC subcommittee meetings, the one work session and both field trips. Our comments, power point presentation and map were respectively received by the RAC subcommittee. We enthusiastically endorse the Proponents Revised Application Proposed Routes for segments 8 & 9. We have thoroughly read and endorse the Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options in or near the Morley Nelson Snake River Birds of Prey National Conservation Area dated May 30, 2014	16000 - Generally support project, 50010 - Segment 8 – Applicants' Proposed Route, 51010 - Segment 9 – Applicants' Proposed Route
101240	2	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	We would like to add information discussed with the subcommittee on the March 27th field trip: Segment 8: Summer Lake Option 1 is to cross HWY 78 250' North of the existing 500 kV line. The Summer Lake Option, once it reaches the existing tower will @ that point become the most eastward kV line. The existing 500kV	50010 - Segment 8 – Applicants' Proposed Route, 48000 - Design Features



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						line will move N. W. of summer lake option to minimize the impact to existing homes and the Blue Canoe 2 Gufty.	
101240	3	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	Segment 9: Baja Road - Murphy Flat South will approach Hemingway N. W. of the Summer Lake Option.	51010 - Segment 9 – Applicants’ Proposed Route, 48000 - Design Features
101240	4	2	OWYHEE CITIZENS TASK FORCE,ERNIE BREUER,ROBYN C THOMPSON	I = Individual (s) not affiliated	QC complete	All lines should enter and exit on the west end of the Hemingway substation to prevent sandwiching the residents residing in the China Ditch community. John Chatburn, Idaho Department of Energy and Keith Georgeson Project Leader Idaho Power are aware of these proposals. We are including a diagram for clarification.	48000 - Design Features
101241	1	1	JOHNSON FARMS,RICK JOHNSON	I = Individual (s) not affiliated	QC complete	I approve of the proposed Segment 8 route that the RAC has proposed.	50010 - Segment 8 – Applicants’ Proposed Route
101273	1	2	LOUIS & DEANNA SANCHEZ	I = Individual (s) not affiliated	QC complete	We strongly approve the proposed Segment 8 Route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes for the Gateway West Transmission Line Project and have concluded on the proposed location through the NCA. Please do not change the route from the NCA, (Morley Nelson Birds of Prey).	50010 - Segment 8 – Applicants’ Proposed Route
101290	1	2	CAROL BRAND,RICK BRAND	I = Individual (s) not affiliated	QC complete	We are pleased that the Companies have adopted the Resource Advisory Council (RAC) subcommittee’s recommended routes as their proposed action.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101290	2	2	CAROL BRAND,RICK BRAND	I = Individual (s) not affiliated	QC complete	By avoiding private land and sage-grouse habitat, these routes minimize conflicts with people and resources.	28070 - Sage-grouse, 34010 - Private Land/Land Ownership
101290	3	2	CAROL BRAND,RICK BRAND	I = Individual (s) not affiliated	QC complete	However, it is disappointing that the Companies did not adopt the RAC subcommittee’s May 30, 2014 recommendations about the Mitigation and Enhancement Portfolio in their August revision of that document. The proposed routes will not be acceptable to BLM and Conservation Lands advocates if they are not accompanied by a substantive and meaningful plan to mitigate and enhance resources and values within the Morley Nelson Snake River Birds of Prey Area. The Companies have not demonstrated that their plan will create a net benefit to the BOPNCA relative to current conditions, and the August version of the plan appears insufficient to meet the enhancement requirements of the enabling legislation. We urge the BLM and the Companies to re-consider the RAC subcommittee comments on the Enhancement package. The May 30 report identifies deficiencies in the plan that still have not been addressed, and it recommends actions that have not been included in the revised plan. The Companies and BLM have invested a great deal of time and money in this project, and it appears they have finally gotten public support for feasible, proposed routes. However, the proposed routes will be dead on arrival if the Companies don’t invest more in constructive and effective mitigation and enhancement. Please don’t let an insufficient enhancement plan stop the progress that has been made thus far.	12000 - Relationships to other federal laws and policies, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes
101238	1	1	SNAKE RIVER RANCH, LLC,C DALE WILLIS JR	B = Business or Business Group	QC complete	After years of work, the Bureau of Land Management (BLM), and the Power Companies (Idaho Power and Rocky Mountain Power) who will finance and build the project, have agreed to routing Segment 8 through Morley Nelson Birds of Prey- NCA. Their agreement, as now proposed, will eliminate millions of dollars of economic damage to our great state which would have occurred had earlier route selections been finalized through private farms, dairies, prime development land and near Kuna and Melba. There is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the	25000 - Socioeconomics, 25050 - Community/city development and expansion, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 34020 - County and City Plans/Zoning, 50010 - Segment 8 – Applicants’ Proposed Route, 58000 - General project effects on State (Idaho)

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						proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA	
101253	1	1	JOAHN MAGLECIC	I = Individual (s) not affiliated	QC complete	I feel like they need to stay away from private land.	34011 - Site the line on public land
101252	1	0	KATHRYN ALDER	I = Individual (s) not affiliated	QC complete	As an outgoing RAC member and as a farmer, "There is "absolutely" no need to look at any other routes, and I approve the proposed segment 8 route that the RAC has proposed. The RAC has spent hundreds of hours and dollars in reviewing all the information. Please approve segment 8 and move on -	50010 - Segment 8 – Applicants’ Proposed Route
101246	1	1	GEORGE A BOUVIER	I = Individual (s) not affiliated	QC complete	The transmission line needs to be run through the Birds of Prey. The modern construction would turn out to be an asset to the birds & wildlife.	28000 - Wildlife (general), 28020 - Raptors/Eagles/Ravens, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route, 48000 - Design Features
101246	3	1	GEORGE A BOUVIER	I = Individual (s) not affiliated	QC complete	Running it through Kuna and Melba residential & farmland would be a disaster to the area.	25000 - Socioeconomics, 25060 - Agriculture, 34010 - Private Land/Land Ownership
101268	1	1	GABIOLA LAND COMPANY LLC,ALBERT GABIOLA	B = Business or Business Group	QC complete	The Gabiola Land Company owns a 120 acre tract of line close to the proposed transmission line project. The legal description of the land is NW 1/4 and S 1/2, NW 1/4, Sec.29, T.1N, R.2E, B.M, Parcel Number S2029220000, Ada County. We prefer that the final route of the transmission be the route furthest from our land so as to minimize the adverse visual and economic impacts on our property.	23000 - Visual Resources, 25000 - Socioeconomics, 50000 - Segment 8 General
101289	1	1	SNAKE RIVER RANCH, LLC,KATHLEEN ZOLDOS	I = Individual (s) not affiliated	QC complete	there is no need to look at any other routes and I approve the proposed Segment 8 route that the Regional Advisory Committee (RAC) has proposed. The RAC has spend hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. PLEASE DO NOT CHANGE THE ROUTE FROM THE NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101227	1	1	LEAH D OSBORN	I = Individual (s) not affiliated	QC complete	"Raptor Expert Morley Nelson assisted PP&L with routing the line so it would not adversely affect raptors and with the designing platforms for transmission towers that would encourage raptor nesting(Nelson and Nelson 1976, Nelson 1982)." This quote came from page 30 of the Draft Mitigation and Enhancement Portfolio Proposal. The enhancement package really needs to do the most possible to address the BIRDS in this area! This whole Gateway West process has been going on for about 6 years....I absolutely support Segment 9 through the BOPNCA. This route needs to be finalized we have come a long way.	28020 - Raptors/Eagles/Ravens, 35030 - Applicants’ MEP (specific to NCA), 35040 - Recommendations for MEP changes, 51010 - Segment 9 – Applicants’ Proposed Route, 48000 - Design Features
101225	1	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	The NPS encourages the Bureau of Land Management (BLM) to make every effort to ensure that transmission lines are constructed and operated in an environmentally responsible manner that serves the public interest, protects cultural and natural resources, and protects our treasured landscapes. While the NPS supports the development and modernization of our nation's energy grid, we maintain that it can and should be done using the least environmentally impactful methods.	16000 - Generally support project, 24000 - Cultural Resources
101225	2	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	NPS recommends the use of the BLM Preferred Alternatives in the vicinity of Hagerman Fossil Beds National Monument (the Monument). If other routes closer to the Monument come under consideration, the NPS may have concerns about visual resources, visitor access during construction, and increased vandalism and theft of resources with off highway vehicles (OHV) and horseback use of new access roads. The NPS requests early interagency coordination with the BLM if there are new developments in potential routes in the vicinity of the Monument.	12000 - Relationships to other federal laws and policies, 23000 - Visual Resources, 36000 - Recreation, 36020 - Off Road Vehicles/OHV, 38000 - Transportation, 50020 - Segment 8 – Routes considered in the 2013 FEIS, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101225	3	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	The NPS encourages the BLM to continue active coordination to protect the visitor experience at Oregon National Historic Trail remnants throughout western Idaho, particularly at intact segments such as those in Hagerman	12000 - Relationships to other federal laws and policies, 19000 - Mitigation (general), 34010 - Private Land/Land Ownership, 36000 - Recreation, 24010 - Historic Trails

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						Fossil Beds National Monument and in the vicinity of Three Island Crossing State Park, and wherever they occur on other public and private lands.Regardless of the alternatives selected, the proposed project will have significant, adverse impacts on the National Historic Trails through Idaho. Although it is too soon to discuss mitigation, NPS would urge BLM to ensure that mitigation to the Oregon National Historic Trail would be commensurate to the impacts.	
101225	4	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	Regarding Segment 8, the BLM Preferred Alternative appears to correspond closely to the North Trail Segment of the Oregon National Historic Trail (NHT), which is shown on NPS brochures as a "segment of the trail offering the best visitor experiences," and which is also a designated High Potential Segments of the trail. High Potential Segments, according to the National Trails System Act, are "those segments of a trail which would afford high quality recreation experience in a portion of the route having greater than average scenic values or affording an opportunity to vicariously share the experience of the original users of a historic route." NHTs also are components of the National Landscape Conservation System, which under BLM Handbook 6280, are supposed to be protected from development. The Proposed Alternative, on the other hand, would include a perpendicular crossing of the Oregon NHT and may have the potential to impact part of the southern route of the Oregon Trail.	12000 - Relationships to other federal laws and policies, 36000 - Recreation, 24010 - Historic Trails, 50010 - Segment 8 – Applicants’ Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101225	5	1	US NATIONAL PARK SERVICE, INTERMOUNTAIN REGION,TAMMY WHITTINGTON	G = Government	QC complete	Regarding Segment 9, the BLM Preferred Alternative appears to intersect the Oregon NHT from the Kings Hill area to where the proposed transmission line turns west to pass over Birds of Prey. However, when using the BLM interactive map on the project website, it is difficult to determine exactly where the proposed line would intersect and/or impact the NHT. NPS requests that BLM provide us geographical layers of the proposed transmission line so that we can better determine the locations where the proposed transmission line and the NHT would intersect.	24010 - Historic Trails, 51020 - Segment 9 – Routes considered in the 2013 FEIS
101291	1	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	However, we join other commenters who have expressed concerns about how this proposed transmission project meets the requirements contained in the language establishing this NCA.	12000 - Relationships to other federal laws and policies, 35010 - Enhancement requirements
101291	2	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Effects on wildlife habitat, plants and animals, including threatened, endangered, and sensitive species;	27000 - Vegetation, 27010 - Special Status Plants, 28000 - Wildlife (general), 28060 - Other Special Status Wildlife, 28080 - Threatened/Endangered Species
101291	3	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Effects to visual resources and existing view sheds;	23000 - Visual Resources
101291	4	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Land use conflicts and consistency or inconsistency with existing federal (BLM) land use plans as well as state and private lands, including the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA);	34010 - Private Land/Land Ownership, 34030 - Federal land Use Plans, 35000 - NCA/SRBOP (general)
101291	5	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Reliability of the transmission infrastructure, particularly in southwest Idaho.	11000 - Purpose and Need for the Project
101291	6	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	More specifically, the Alliance recommends that BLM, as part of its crafting of this Supplemental Environmental Impact Statement, explore in more detail “The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public land in the conservation area.” We recommend that BLM and the proponents better describe how the installation of a high-voltage transmission line across this NCA adheres to the above prescriptions and how this proposed transmission line advances the purposes of the establishment of this NCA.	12000 - Relationships to other federal laws and policies, 35010 - Enhancement requirements
101291	7	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	It is clear from the record that there are fundamental differences on potential avian impacts in important areas should this project move forward. We offer	28020 - Raptors/Eagles/Ravens

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						no expertise, but we recommend that this environmental analysis includes science-based, defensible examinations of those impacts.	
101291	8	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We are pleased that the Western Electric Coordinating Council (WECC) has reduced the separation distance between parallel transmission lines to 250 feet.	48000 - Design Features
101291	9	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We are also pleased that BLM has considered changes to the proposed alignments as recommended by its RAC.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101291	10	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	The Alliance also believes that the proponent utilities (Idaho Power, Rocky Mountain Power, and Bonneville Power Administration) will remain liable for any required restoration required by any or all disturbances, and that any such restoration is undertaken in such a way that eliminates the possibility of transmission of invasive plant or animal species.	27020 - Invasive Plants/weeds, 28000 - Wildlife (general)
101291	11	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We have numerous concerns regarding how these two proposed Segments 8 and 9 will traverse private, state, and federal properties and we expect those issues will be addressed in the DSEIS.	34010 - Private Land/Land Ownership
101291	12	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We ask BLM to conduct a more thorough analysis of why this NCA was created and what, specifically, the Department of Interior, as the curator of this important NCA, has done to ensure its future successes. There are only sparse references to the history of this important wildlife area, and a weaker record of actions by the Proponents to defend and protect the lands for which these agencies have been entrusted.	35000 - NCA/SRBOP (general)
101291	13	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	The Alliance asks BLM and the Utility Proponents to demonstrate how the establishment of additional transmission lines through and across the Snake River Birds of Prey National Conservation Area as approved by the 103rd Congress within Public Law 103-64 comports with the Act’s language above or, in the alternative, how this proposal does not comport with the language in the Act. We also recommend that the DSEIS address specifically the above paragraph, and how this project will conserve, let alone protect, native raptors within the NCA.	12000 - Relationships to other federal laws and policies, 28020 - Raptors/Eagles/Ravens, 35000 - NCA/SRBOP (general)
101291	14	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	We recommend to BLM that it explore in greater depth possible impacts to known raptor nests and roosts as reflected in Figure E 10-6. It is clear that, as would be expected in and adjacent to the NCA, there is considerable raptor activity between the two proposed segments, and we expect the DSEIS will examine possible impacts in detail. It appears that the proposed Segments 8 and 9 will avoid to the extent possible known Greater Sage-grouse leks ads well as most of the sagebrush habitat (in the Case of Segment 9). As with possible impacts to raptors, we expect possible impacts to sage-grouse to be fully examined.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse, 51010 - Segment 9 – Applicants’ Proposed Route
101291	15	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Regarding Segment 8, we are relieved that the Proposed Route south of Owyhee, would take the line further from impacting the Kuna area. The Deferred Decision Route that would have run north of Owyhee and much closer to the Kuna community was unacceptable.	50010 - Segment 8 – Applicants’ Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101291	16	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Finally, the Alliance asks that BLM, in its forthcoming DSIES, describe how these proposed Segments 8 and 9 fit into that portion of the Gateway West transmission project that has already been approved by the federal agencies.	10000 - Conformance with the NEPA process
101291	17	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	Regardless of which routes are finally proposed by BLM and the Proponents, we believe it is of the utmost importance that all actions taken by the Utility Proponents are thoroughly and transparently examined by a third party. If this agreement is approved, we join our colleagues in insisting that the implementation of the terms of the agreement are upheld. We expect that Idaho Power provides some of the financing for this 3rd-Party evaluation, particularly as it relates to promised habitat restoration [as contained in the	35010 - Enhancement requirements



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						eventual agreement] and also as it relates to law enforcement to ensure the conditions of this agreement remain intact	
101291	18	1	SNAKE RIVER ALLIANCE,KEN MILLER	S = Special Interest Group	QC complete	It is possible that this proposal may require amendment of one or more BLM land use plans or management framework plans. Should that occur, we agree with BLM that “the BLM will integrate the land use planning process with the NEPA analysis process for this project.”	34030 - Federal land Use Plans
101254	1	1	SUSAN KELLY	I = Individual (s) not affiliated	QC complete	I have seen the proposed BLM line which runs very near to my home as well as Idaho Power's proposed line. I am for the Idaho Power line. These are currently lines closer to the Swan Falls area and it makes more sense to keep the line away from the humans that live in my area. I purchased my land for the views and do not want a view of a large power line. Please move the line south to Swan Falls area.	23000 - Visual Resources, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101254	2	1	SUSAN KELLY	I = Individual (s) not affiliated	QC complete	My dog, my family & the community of Kuna use the current BLM land south of Kuna for various sports including hiking, cross country running, biking, four wheeling. It would be a shame to expose it to industrial line that can be moved to areas less used by the community.	25050 - Community/city development and expansion, 36000 - Recreation, 36010 - Trails, 36020 - Off Road Vehicles/OHV, 57000 - General project effects on Counties
101254	3	1	SUSAN KELLY	I = Individual (s) not affiliated	QC complete	We are situated at the west end of Kuna mora south two miles of Kuna. We are directly impacted by the proposed line. Please consider moving the lines further south of our home.	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route
101259	1	1	RICHARD & SUE FARNER	I = Individual (s) not affiliated	QC complete	I strongly encourage you to stay with-in your comments "There is no need to look at any other routes and I approve the proposed Segment 8 route that the RAC has proposed. The RAC has spent hundreds of hours and thousands of dollars in reviewing various routes and concluded on the proposed location through the NCA. Please do not change the route from the NCA.	50010 - Segment 8 – Applicants’ Proposed Route
101261	1	1	REED A & GEORGIA A SMITH	I = Individual (s) not affiliated	QC complete	I support the Birds of Prey routes for segments 8 & 9 for the Gateway West Transmission Line.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101261	2	1	REED A & GEORGIA A SMITH	I = Individual (s) not affiliated	QC complete	Because the original route on private land would have completely blocked my over the air TV reception at Oreana.	34010 - Private Land/Land Ownership, 40000 - Electrical Environment
101261	3	1	REED A & GEORGIA A SMITH	I = Individual (s) not affiliated	QC complete	Besides protecting Killer birds was never a good idea. (Bird of prey) Contributors to the demise of the sage grouse and all bug eating birds which cause half dead forests which burn easier.	28000 - Wildlife (general), 28070 - Sage-grouse, 41000 - Public Safety
101270	1	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	these segments 8 and 9 need to go north of the Snake River using the existing energy corridor which already functions without invading private property owners, endangering species or our scenic, pristine vistas and property values.	23000 - Visual Resources, 25030 - Property Values, 28080 - Threatened/Endangered Species, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101270	2	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	our health (sorry but many of us are not convinced that living under these high energy lines is safe or wise and why would you risk THAT?)	41000 - Public Safety
101270	3	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	To protect our wildlife, particularly the endangered Sage Grouse! The Sage Grouse must co-habitate great with cattle or they would not have survived HERE all these years! But if you put Powerlines over here for the raptures to hung from the Sage Grouse plus all the rest of our game birds will diminish. The Raptors are over here hunting all the time.	28020 - Raptors/Eagles/Ravens, 28070 - Sage-grouse
101270	4	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	Others Reasons for segments 8 + 9 to be North of the Snake River: 1. Time. It is faster. It is shorter. It is much more Level and there are already dirt Rds there. IT is easier to access for building and maintenance.	38000 - Transportation, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route, 48000 - Design Features
101270	5	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	Also, in case of, no, when there is a sudden brush fire it will be better, quicker north of the River to control!	41000 - Public Safety
101270	6	1	MARCY PETERSON	I = Individual (s) not affiliated	QC complete	Less Resistance. Save Time, money and effort. Less Resistance from People & elements. Save Time. Save Money. Do The Right Thing!	48000 - Design Features
101271	1	1	DONNA VENLTUIZEN	I = Individual (s) not affiliated	QC complete	90% of our traffic comes through the main entrance of Melba. Who would move here if the powerlines come through the main entrance>	25000 - Socioeconomics, 38000 - Transportation
101271	2	1	DONNA VENLTUIZEN	I = Individual (s) not affiliated	QC complete	You will destroy what little business we have here.	25000 - Socioeconomics



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101271	3	1	DONNA VENLTUIZEN	I = Individual (s) not affiliated	QC complete	You already have a solution, you already have powerlines south of Melba. Why cause more environmental impacts erecting them through Melba/ Kuna. We do hope you decide on the BLM proposal which will save our community.	50010 - Segment 8 – Applicants’ Proposed Route
101262	1	1	RAE GRIMES	I = Individual (s) not affiliated	QC complete	Stay away from home and land with home [illegible] stay.	34010 - Private Land/Land Ownership
101263	1	1	JOAHN MAGLECIC	I = Individual (s) not affiliated	QC complete	I don't think gateway need to come on privit land.	34010 - Private Land/Land Ownership
101264	1	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	Is it really needed?	11000 - Purpose and Need for the Project, 17000 - Generally oppose project
101264	2	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	Why is Wyoming Power not included in a national grid of Elec. power. Our national grid should be upgraded for future generations not individual corporations. All transmission lines should be upgraded to 500 kV.. Right of ways are already in place - no need to take personal or private property out of existence. A free market will help improve for all. (MA Bell is a good example:) as a citizen of Idaho I should be able to buy power from Wells Dam, a Douglas County Washington Pud, if I wanted to.	10010 - Out of scope comments, 17000 - Generally oppose project
101264	3	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	If BLM allows seg. 8 & 9 to go forth and any land restricted, BLM should open Public Lands for Development. To replace lost farm or private lands.	34011 - Site the line on public land, 35020 - Mitigation suggestions, 50000 - Segment 8 General, 51000 - Segment 9 – General
101264	4	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	From Midpoint go northwest and follow existing line north of Gooding - North of King Hill - stay on BLM Grounds to south of Man Field. The line and right of way and all envoirmental probems have already occurred.	50000 - Segment 8 General, 48000 - Design Features
101264	5	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	If Idaho PWR is forced to go thru private property, BLM should request that Rocky Mtn. and Idaho Pwr pay for loss of private land or use of it.	34010 - Private Land/Land Ownership, 35020 - Mitigation suggestions
101264	6	1	WILLIAM CHASTEEN	I = Individual (s) not affiliated	QC complete	EPA, A corp of ENG, and BPA should be involved also in this proposal.	10000 - Conformance with the NEPA process
101266	1	1	GENE BORN	I = Individual (s) not affiliated	QC complete	I view the map's on segments 8 and 9 and like what was presented. I feel we have a nice route for The Transmission Line's, lets stop talking about it, wasting money and time and set the project in motion.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101216	1	1	PEGGY ROBINSON	I = Individual (s) not affiliated	QC complete	I approve the Boise RAC route - It avoids my property in Oreana	34010 - Private Land/Land Ownership, 51010 - Segment 9 – Applicants’ Proposed Route
101294	2	1	LOUIS MONSON	I = Individual (s) not affiliated	QC complete	We already have one hi voltage power transmission line running over the subdivision and there is no way we will allow another hi voltage power transmission line to further degrade our property values. Our property values have gone down with the increase in size of the substation and the current transmission line.	25030 - Property Values, 34010 - Private Land/Land Ownership
101294	1	1	LOUIS MONSON	I = Individual (s) not affiliated	QC complete	I am writing this comment to voice our displeasure and opposition to the placement of SEGMENT 8 from mile 126 to its terminus at the Wilson (Hemingway) Idaho Power Sub Station . The routing of the line is right thru the China Ditch subdivision. It parallels Trail Drive Road and is in a dry river bed. (which is not always "Dry").	33000 - Water Resources and Use, 50010 - Segment 8 – Applicants’ Proposed Route
101300	1	1	CITY OF MELBA, PLANNING AND ZONING COMMISSION,JANICE SCHACHTER-CHANEY	I = Individual (s) not affiliated	QC complete	If these transmission lines come through Melba Road, not only will they take farms away, businesses will not want to come to Melba and certainly new houses will not be built.	25000 - Socioeconomics, 25050 - Community/city development and expansion, 25060 - Agriculture, 34020 - County and City Plans/Zoning
101300	2	1	CITY OF MELBA, PLANNING AND ZONING COMMISSION,JANICE SCHACHTER-CHANEY	I = Individual (s) not affiliated	QC complete	Also, through Birds of Prey, there are already transmission lines, and the sage grouse have thrived. Why can't the lines go through there?	28070 - Sage-grouse, 50010 - Segment 8 – Applicants’ Proposed Route, 48000 - Design Features
101300	3	1	CITY OF MELBA, PLANNING AND ZONING COMMISSION,JANICE SCHACHTER-CHANEY	I = Individual (s) not affiliated	QC complete	Segment 8, Route down Melba Road to the highway and over to the river. If the farm land is confiscated, will the farmers get a fair price?	25030 - Property Values, 25060 - Agriculture, 50000 - Segment 8 General
101301	1	1	JAMES & JANE TAYLOR	I = Individual (s) not affiliated	QC complete	Concerned of the south route, north of Murphy Airport, crossing highway 78. Very dangerous, low light levels and at night.	23000 - Visual Resources, 41000 - Public Safety, 51010 - Segment 9 – Applicants’ Proposed Route
101301	2	1	JAMES & JANE TAYLOR	I = Individual (s) not affiliated	QC complete	I am a han radio operator in Guffey, will it infringe on my radio transmissions?	40000 - Electrical Environment
101302	1	1	STEVE KAUFMAN	I = Individual (s) not affiliated	QC complete	Follow the existing line (Segment 8) on federal land.	50000 - Segment 8 General
101299	1	1	DOUG HIPWELL	I = Individual (s) not affiliated	QC complete	Prefer the route we agreed on originally, the agreed upon line, parallels existing lines on federal land (Segment 8).	50020 - Segment 8 – Routes considered in the 2013 FEIS

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101269	1	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	Where the transmission line must cross the routes of the Oregon or California National Historic Trails, utilize trail route sections already disturbed by other developments and where no historic trail remnants exist. Where the transmission line must parallel the route or a historic trail, utilize existing transmission line corridors, or in situations where there are no existing transmission lines, avoid infringing upon the viewshed, seen from historic trail remnants.	23000 - Visual Resources, 24010 - Historic Trails, 48000 - Design Features
101269	2	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	After reviewing the EIS's National Historic Trails map, it appears the proposed route will cross of come in very close proximity to trail remnants in the following areas: 1) Big Hill 2) Cedar Mtn to Bradley Mtn on Hudspeths Cutoff 3) Raft River 4) North of Glenn's Ferry 5) C.J. Strike Reservoir 6) and the Murphy Flat - Rabbit Creek area. Idaho Power has adjusted the route of the transmission line to minimize adverse impacts on the South Alternate Oregon Trail in the Murphy Flat - Rabbit Cr. area. Hopefully, [illegible] route adjustments have or can be made in the other areas.	18000 - Comments on segments 1 to 7 & 10, 24010 - Historic Trails, 50000 - Segment 8 General, 51000 - Segment 9 – General, 48000 - Design Features
101269	3	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	The proposed route from Glenn's Ferry to Indian Creek follows an existing powerline corridor, and construction should have minimal impact on viewshed seen from the Oregon Trail.	23000 - Visual Resources, 24010 - Historic Trails, 50010 - Segment 8 – Applicants’ Proposed Route
101269	4	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	The proposed transmission line route on the north or east side of the Snake River may have only a minimal impact upon views seen from the south ALT Oregon Trail.	23000 - Visual Resources, 24010 - Historic Trails, 51010 - Segment 9 – Applicants’ Proposed Route
101269	6	1	OREGON-CALIFORNIA TRAILS ASSOCIATION, IDAHO CHAPTER,WALLY MEYER	S = Special Interest Group	QC complete	The Idaho Chapter of OCTA supports the Gateway West Programatic Statement for historic preservation, the cultural Resources Protection Plan, and the off-site mitigation projects proposed by Idaho Power to compensate for unavoidable impacts to historic and archeological resources from the Gateway West transmission line project.	19000 - Mitigation (general), 24000 - Cultural Resources, 24010 - Historic Trails
101226	1	2	TEENA LEWIS	I = Individual (s) not affiliated	QC complete	My husband & I are in agreement with the Idaho Power proposed route in the Snake River Birds of Prey (NOA) for section 9 of the Gateway West Project. Keep it off the private lands and keep in on the existing public lands where the lines already are.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 51010 - Segment 9 – Applicants’ Proposed Route
101217	1	1	JERRY L AND MARY LOU TLUCEK	I = Individual (s) not affiliated	QC complete	We own several farms near Melba where Summer Lake Power already exists We have that power lines through over one mile of farm propeitys now. We have several pivots installed that would be affected if this proposed power line was installed 250 feet from the summer Lake Power line exists. Unless this new power line would not be installed over the top of the summer lake line, we will do everything we can to oppose this new line.	37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 50010 - Segment 8 – Applicants’ Proposed Route, 48000 - Design Features
101218	1	1	CITY OF GRAND VIEW,FRANKLIN D HART	G = Government	QC complete	the Grand View City Council offers this letter of support for the Gateway West Transmission Line Project's new proposed routes for segments 8 and 9.	16000 - Generally support project, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101218	2	1	CITY OF GRAND VIEW,FRANKLIN D HART	G = Government	QC complete	Grand View appreciates the new routes, documented on the attached Bureau of Land Management map, titled, Transmission Line Project, Segments 8 and 9 Overview, Appendix A - 1, and, believes them to be the most land owner and environmentally friendly, as previously analyzed in the final EIS and reflected as feasible alternative locations.	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101209	1	1	BOYD ANDERSON	I = Individual (s) not affiliated	QC complete	I don't know of one elected official who is in support of Gateway going through private property. I think Frank Priestley, President of Idaho Farm Bureau, is correct in his article, which I have attached. I am in the process of changing our property from residential to Commercial, with the intent of putting in an airport. If Gateway comes down Barker road, it would be impossible to do as the take off and landing would be impossible with the high power lines. Please consider this in your planning, and stay off of private property as much as possible.	34010 - Private Land/Land Ownership, 34011 - Site the line on public land, 38000 - Transportation, 50020 - Segment 8 – Routes considered in the 2013 FEIS

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101293	1	1	GABIOLA LAND COMPANY LLC,ALBERT GABIOLA	B = Business or Business Group	QC complete	I would like to know the distance from our land to the the " Proposed Route" and the "Deferred Decision Route" as the transmission line will have a visual impact on future development of our land.	23000 - Visual Resources, 34010 - Private Land/Land Ownership
101298	1	1	CON ZEYER	I = Individual (s) not affiliated	QC complete	I farm and would be very much approved of Applicants' proposed Segment 8 route.	37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 50010 - Segment 8 – Applicants’ Proposed Route
101297	3	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	Also glad that the lines can now be just 250m apart so they don't take up so much space in the NCA.	35000 - NCA/SRBOP (general), 48000 - Design Features
101297	4	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	You should talk to Eriks Garsvo of the Canyon County Historical Museum in Nampa. He's done a lot of work recently on mapping stage lines between Kuna and Silver City, and determine where there's still traces, and it would be good if the line didn't go through them. Perhaps mitigation could be involved. I assume you're also talking to the Owyhee County Museum people to check on the historic trails in their region as well. The historic trails map you had here was just too small to be able to tell.	19000 - Mitigation (general), 24010 - Historic Trails
101297	1	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	In general, like this one *much* better than the previous preferred alternative that cut through Kuna land and went through downtown Melba.	50010 - Segment 8 – Applicants’ Proposed Route
101297	2	1	KUNA HISTORICAL SOCIETY,SHARON FISHER	I = Individual (s) not affiliated	QC complete	Happy to see that while it goes near Celebration Park and Guffey Bridge, it doesn't seem to impact them much. I do wonder how close it's going to the Halverson Bar cultural area and I hope you're working with the Canyon County people to determine that.	24000 - Cultural Resources, 36000 - Recreation
101208	1	1	LON P & MARY ELLEN BOTTS	I = Individual (s) not affiliated	QC complete	We would much prefer that FEIS alt 8-C remain out of consideration. We already have 1 major power line that was in place when we purchased our land. We are not interested in any more.	34010 - Private Land/Land Ownership, 50020 - Segment 8 – Routes considered in the 2013 FEIS
101296	1	1	JOHN WIND	I = Individual (s) not affiliated	QC complete	The reason I'm concerned about high voltage power lines coming close to our dairy site because of the stray voltage associated with power lines. It would not be good for the operation because in California, my operation near a high power line caused a major reduction in milk production of our cows. It is hard to detect the stray voltage. The best thing that ever happened was to move out of California and move to here where there are wide open spaces. By moving here, away from the power lines in California cured the stray voltage problems in the herd.	25060 - Agriculture, 37000 - Agriculture (includes crop production, dairies, cattle feedlots, and grazing), 40000 - Electrical Environment
101248	1	1	RICK & KRISTI MORINO	I = Individual (s) not affiliated	QC complete	I think the new segment 8 is much better improvement than the first drafts. Thanks for the update. It looks like the new route follows some of the previous transmission line routs. I think keeping the large towers outside the areas of town is a better choice.	34020 - County and City Plans/Zoning, 50010 - Segment 8 – Applicants’ Proposed Route, 48000 - Design Features
101237	1	1	USDA NATURAL RESOURCES CONSERVATION SERVICE,JEFF BURWELL	G = Government	QC complete	I am pleased to report that the proposed route for segments 8 and 9 would not affect any NRCS conservation easements.	50010 - Segment 8 – Applicants’ Proposed Route, 51010 - Segment 9 – Applicants’ Proposed Route
101245	1	1	SNAKE RIVER RANCH, LLC,C DALE WILLIS JR	B = Business or Business Group	QC complete	I am writing this email to confirm our approval for the proposed route for Segment 8 through the Morley Nelson Snake River Birds of Prey NCA. It only makes sense to construct the line adjacent to the existing 500 KV line that currently runs through the NCA.	50010 - Segment 8 – Applicants’ Proposed Route, 48000 - Design Features
101245	2	1	SNAKE RIVER RANCH, LLC,C DALE WILLIS JR	B = Business or Business Group	QC complete	The proposed route would have fewer economic and environmental impacts than running it through private lands and adjacent to populated areas in Boise, Kuna, and Melba.	25000 - Socioeconomics, 34010 - Private Land/Land Ownership
101295	1	0	IDAHO PRESS-TRIBUNE,BOB ATKINSON	B = Business or Business Group	QC complete	I was calling because I was trying to get some more information about the Gateway West project.	10010 - Out of scope comments
101244	1	1	MICHAEL STUKEL	I = Individual (s) not affiliated	QC complete	I'm in favor of the new PROPOSED ROUTE for Segment 8, which utilizes BLM land. Overall, the power project is for public benefit and the route should favor public land.	34011 - Site the line on public land, 50010 - Segment 8 – Applicants’ Proposed Route

Letter #	Comment #	Signatures	Letter owners	Group	Coding status	comment	category
101244	2	1	MICHAEL STUKEL	I = Individual (s) not affiliated	QC complete	With all the public land available it seems silly to make private landowners shoulder the burden of this project. The negative economic impact to me would be substantial.	34010 - Private Land/Land Ownership
101236	1	1	ROBERT E KNAPP	I = Individual (s) not affiliated	QC complete	As a property owner in Melba, Idaho I do not want the Gateway West Transmission line in our community. This is an area of farms and small acreage parcels that will continue to grow and I do not approve of it coming through Melba. It should go on the proposed route (red line) to the south of town.	25050 - Community/city development and expansion, 25060 - Agriculture, 34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route
101207	1	1	GLENN RODGERS	I = Individual (s) not affiliated	QC complete	I own some land there on the corner of, just north of Melba on Southside Drive and Belmont. I had a question about the proposed alternative route going through Melba, if that would go along South Side Drive, or where would that be located?	34010 - Private Land/Land Ownership, 50010 - Segment 8 – Applicants’ Proposed Route
101232	1	1	RANDY SHEPARD	I = Individual (s) not affiliated	QC complete	As I stand on my deck at 2298 Bench Road Montpelier Idaho, and look out at the mountains, I realize that not far into the future I will have your towers and lines blocking everything which is beautiful about our home. When I talked to one of your employees a while back, he said there is nothing I can do about it, because your lines don't go over my property....just very near it. Lines are one thing but staring at the towers is not desirable.	18000 - Comments on segments 1 to 7 & 10, 23000 - Visual Resources, 34010 - Private Land/Land Ownership
101232	2	1	RANDY SHEPARD	I = Individual (s) not affiliated	QC complete	After your tower and lines are up, we will just be an old home on Baltic avenue, as far as the game of Monopoly is compared. As you gain your new avenues to sell and move power, I will loose in value, what ever my home might be worth. The old building is a historical building in the area for those who have lived there for generations. It started as a school built around 1910, then it was an armory for the military, then a dance hall and a moose lodge. The it became a church for Christian services, before it became a cabinet shop and then our home around 1995. I realize that the deal with your power lines are kind of one sided,....imagine if you were in my shoes...how would you feel? Wouldn't you seek assistance from attorneys? I await your thoughts on this matter, I'm sure that I have little resources compared to your legal teams, but one could hope they can appeal to reason and fairness, even in a world of stone hearts.	17000 - Generally oppose project, 18000 - Comments on segments 1 to 7 & 10, 24000 - Cultural Resources, 25030 - Property Values

**APPENDIX C**  
**PUBLIC NOTICES**

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**Appendix C-1**  
**Notice of Intent to Prepare an SEIS**

*Respondents:* Individuals.  
*Number of Respondents:* 8,000 per year, on average.  
*Total Number of Responses:* 8,000 per year, on average.  
*Frequency of Response:* Once.  
*Estimated Time per Response:* 1 hour.  
*Estimated Total Annual Hour Burden:* 8,000 hours.  
*Estimated Total Annual Non-Hour Dollar Cost:* \$0.

Dated: September 15, 2014.

**Christine Cho,**

*Acting Deputy Director for Information Resources.*

[FR Doc. 2014-22440 Filed 9-18-14; 8:45 am]

**BILLING CODE 4310-4J-P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[14XL LLWY9200000.L51010000.ER0000.  
 LVRWK09K0990.241A.00; 4500069121; IDI-  
 35849]

### Notice of Intent To Prepare a Supplemental Environmental Impact Statement and Possible Land Use Plan Amendments for Segments 8 and 9 of the Gateway West 500-kV Transmission Line Project in Idaho

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice.

**SUMMARY:** The Bureau of Land Management (BLM) Idaho State Office announces its intention to prepare a supplemental environmental impact statement (EIS) analyzing the potential impacts of approving a right-of-way (ROW) application for Segments 8 and 9 of the Gateway West 500-kilovolt (kV) Transmission Line Project and possible land use plan amendments. The supplemental EIS will be prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA). The supplemental EIS is being prepared based on new information described in the **SUPPLEMENTARY INFORMATION** section of this notice. The BLM issued a Record of Decision (ROD) for the project on November 14, 2013. In that ROD, the BLM deferred offering a ROW grant for two of the 10 segments—Segments 8 and 9—to allow additional time for Federal, State, and local permitting agencies to examine additional options regarding siting route segments and mitigation and enhancement measures for those segments.

**DATES:** This notice initiates a 30-day public scoping period that will assist in the preparation of a draft supplemental EIS. Comments may be submitted in

writing until October 20, 2014, or 15 days after the date of the last public scoping meeting, whichever is later.

To provide the public an opportunity to review the proposal and project information, the BLM expects to hold four public meetings in Idaho communities during the scoping period. The BLM will announce the exact dates, times, and locations for these meetings at least 15 days prior to each event. Announcements will be made by news release to the media, newsletter mailings, and posting on the project Web site listed below.

**ADDRESSES:** You may submit comments or resource information related to the project by any of the following methods:

- Web site: [http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.html](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html)
- Email: [blm\\_id\\_gateway\\_west@blm.gov](mailto:blm_id_gateway_west@blm.gov)
- Mail: Bureau of Land Management Idaho State Office, Gateway West Transmission Project, 1387 South Vinnell Way, Boise, ID 83709

#### FOR FURTHER INFORMATION CONTACT:

Heather Feeney, BLM Boise District Office, 3948 Development Avenue, Boise, ID 83705; phone 208-384-3325; or email to [blm\\_id\\_gateway\\_west@blm.gov](mailto:blm_id_gateway_west@blm.gov). Contact Ms. Feeney if you wish to have your name added to the project mailing list. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact Ms. Feeney during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

#### SUPPLEMENTARY INFORMATION:

Documents pertinent to this proposal may be examined at:

- Bureau of Land Management, Idaho State Office, Public Room, 1387 South Vinnell Way, Boise, ID 83709, Telephone: 208-373-3863.
- Bureau of Land Management, Boise District Office, 3948 Development Avenue, Boise, ID 83705, Telephone: 208-384-3300.
- Online: [http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.html](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html).

PacifiCorp, dba Rocky Mountain Power, and Idaho Power (Applicants) have submitted a ROW application to locate 500-kilovolt (kV) electric transmission lines on Federal lands as part of the Gateway West Transmission Line Project. The initial application proposed to construct electric transmission lines from the Windstar Substation near the Dave Johnston Power Plant at Glenrock, Wyoming, to

the Hemingway Substation near Melba, Idaho, approximately 20 miles southwest of Boise, Idaho. The original project comprised 10 transmission line segments with a total length of approximately 1,000 miles. The November 2013 ROD authorized routes on Federal lands for Segments 1 through 7 and Segment 10 but deferred a decision for Segments 8 and 9. The Applicants submitted a revised project application for Segments 8 and 9. This notice announces that the BLM, Idaho State Office, intends to prepare a supplemental EIS for Segments 8 and 9 of the Gateway West Transmission Line Project and begins the scoping process to seek public input on new issues and resource information related to Segments 8 and 9, described below. Analysis in the supplemental EIS will support a decision on whether to approve, approve with modifications, or deny the revised ROW application for Segments 8 and 9.

In November 2013, the BLM requested the Boise District Resource Advisory Council (RAC) to consider issues surrounding siting Segments 8 and 9 of the Gateway West Transmission Line Project. As proposed, these segments would traverse portions of the BLM Boise District in and around the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), as well as on private lands. The RAC, a citizen-based council chartered under Section 309 of the Federal Land Policy and Management Act (FLPMA) and the Federal Advisory Committee Act, advises and makes recommendations to the BLM on resource and public land management issues in southwestern Idaho. The RAC formed a subcommittee to examine options for resolving remaining issues associated with siting Segments 8 and 9. On June 5, 2014, the RAC provided the BLM with the report on alternative route options and resource considerations for Segments 8 and 9. On August 8, 2014, the Applicants formally adopted routes recommended by a majority of the subcommittee as their proposed routes for the supplemental EIS in a revised project application that modifies the Applicants' original proposal. These updated proposed routes, a double-circuit design feature (see below), and additional mitigation measures are major components of the new information now available for public scoping.

The Applicants' proposed route for each of the two segments has been modified from the 2013 BLM Preferred Route west of approximate midway points, identified as "nodes" in reports submitted by the RAC. Maps that

accompanied the revised project application are available on the BLM project Web site, listed above. For Segment 8, the Applicants' new proposed route still begins at the existing Midpoint Substation and continues west past the communities of Hammett and Mountain Home to the north. However, just north of the town of Orchard, the new proposed route for Segment 8 diverges from the 2013 BLM Preferred Route to generally parallel the existing Summer Lake 500-kV transmission line 250 feet to the south for 5.1 miles before turning northwest, and then crosses the existing line at milepost 7.1.

The new proposed route for Segment 8 enters the NCA at milepost 99. The Applicants have determined that the separation distance between the existing and proposed transmission lines within the NCA could be reduced to approximately 250 feet for a 28.7-mile portion of Segment 8. From milepost 7.1, the new proposed route generally parallels the existing line 250 feet to the north for the remaining distance (30 miles) into the Hemingway Substation, near the town of Melba. The total route length would be 38 miles, of which 22.9 miles would be within the NCA. This route would also require a partial rebuild of approximately 3,000 feet of the existing Summer Lake line. The Applicants propose to use existing roads near and beneath the existing 500-kV transmission line to reduce the overall disturbance footprint of the new line. Rather than constructing a new access road network for the new proposed route for Segment 8, they would use short spur roads from existing roads to access the new towers.

For Segment 9, the Applicants' updated proposed route still starts at the proposed Cedar Hill Substation and passes south of the communities of Twin Falls, Castleford, and Hammett, before diverging from the 2013 BLM Preferred Route just east of the town of Bruneau, and then entering the NCA at milepost 132, north of the towns of Grand View, Oreana, and Murphy before terminating at the Hemingway Substation, near the town of Melba. The Applicants' new proposed route generally follows the Alternative 9G route studied in detail in the 2013 Final EIS. The total route length would be 68.5 miles, of which 53.8 miles would be within the NCA. The updated proposed route for Segment 9 would involve constructing approximately 25.6 miles of new double-circuit 500/138-kV transmission line using steel pole H-frame structures.

The NCA lies in the western portion of the Gateway West project area. The

NCA was established under Public Law 103–64, which states: “The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.”

Following publication of the Notice of Availability for the Gateway West Final EIS on April 26, 2013 (78 FR 24771), the Applicants submitted a draft Mitigation and Enhancement Portfolio (MEP) to the BLM. The MEP contains proposed mitigation, including compensatory mitigation, and other measures intended to enhance resources and values found in the NCA. The Applicants presented the draft MEP to the RAC subcommittee and updated it in response to the subcommittee's final report; the MEP has not yet been formally reviewed by the public. The most current MEP is considered part of the proponent's newly submitted plan of development for analysis in the supplemental EIS and is now being made available during the scoping process as new information for the supplemental EIS. The MEP will be described in detail at the public scoping meetings and is available on the project Web site at [http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.html](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html).

The BLM is the lead Federal agency for the NEPA analysis process and preparation of the supplemental EIS. The State of Idaho, local government entities, and Federal agencies with specialized expertise and/or jurisdictional responsibilities in the area of Segments 8 and 9 will be invited to participate as cooperating agencies.

The purpose of public scoping is to determine relevant issues that will influence the scope of the environmental analysis. The BLM will invite and provide for full public participation and comment on issues, potential impacts, mitigation measures, and alternatives associated with granting ROWs on public lands for segments 8 and 9 that were not addressed in the original EIS. At present, the BLM has identified the following issues and concerns:

- Effects to the objects and values for which the NCA was designated;
- Land use conflicts and inconsistency with land use plans;
- Effects of the project on local and regional socioeconomic conditions;
- Effects on wildlife habitat, plants, and animals, including threatened, endangered, and sensitive species;

- Effects to visual resources and existing viewsheds;
- Effects to historic and cultural resources;
- Effects to Indian trust assets;
- Opportunities to apply mitigation strategies for on-site, regional, and compensatory mitigation; and
- Siting on private lands versus public lands.

If authorized, this proposal may require amendment of one or more BLM land use plans (resource management plans (RMPs) or management framework plans (MFPs)). By this notice, the BLM is complying with requirements outlined in 43 CFR 1610.2(c) that the BLM notify the public of potential amendments to land use plans. If an RMP or MFP amendment is necessary, the BLM will integrate the land use planning process with the NEPA analysis process for this project.

If the ROWs are granted, BLM land use plans that may be amended include the Twin Falls MFP, the Jarbidge RMP, the Morley Nelson Snake River Birds of Prey RMP, the Bennett Hills/Timmerman Hills MFP and the Kuna MFP.

The BLM will supplement the analysis found in the Gateway West Transmission Line Project final environmental impact statement (FEIS) released April 26, 2013, by analyzing the Applicants' updated proposed routes for Segments 8 and 9 and no action alternatives, as well as other possible alternatives to the proposed power line locations and access routes, based on information gathered from the public during scoping. The BLM will use the NEPA process to identify and disclose impacts to the above resources not analyzed in the FEIS and any additional issues or resources found through the scoping process. Further, the BLM will identify opportunities to mitigate the impacts of siting and building Segments 8 and 9, if granted, by incorporating avoidance, minimization, and compensation measures with consideration of local and regional conditions and commensurate with the scope of the impacts. In addition, opportunities for enhancement of objects and values within the NCA will be evaluated, in accordance with Public Law 103–64, the statute which established the NCA.

Preliminary planning criteria for any RMP or MFP amendments include: (1) FLPMA and subsequent BLM land use plans; (2) Public Law 103–64, which established the Snake River Birds of Prey National Conservation Area (officially named the Morley Nelson Snake River Birds of Prey National Conservation Area in Public Law 111–

11, the Omnibus Public Lands Management Act of 2009); (3) The Endangered Species Act, as amended and (4) the analysis found in the FEIS.

The BLM encourages comments concerning the Applicants' new proposed routes for Segments 8 and 9, the routes previously analyzed in the FEIS, feasible alternative locations, possible mitigation and enhancement measures, and any other information relevant to the proposed action. You may submit comments in writing to the BLM at any public scoping meeting or at any time by using one of the methods listed in the **ADDRESSES** section of this notice. Public scoping meetings will be conducted in an "open house" format with the BLM staff and project Applicants available to explain project details and gather information from interested individuals or groups. You should submit comments by the close of the 30-day scoping period or 15 days after the last public meeting, whichever is later.

The BLM will reach out to the consulting parties who participated in and/or signed the Programmatic Agreement (PA) for Segments 1–7, and 10 to assist the agency in satisfying the public involvement requirements under Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470(f)) pursuant to 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed action will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA. The information received will be used to modify the PA to clearly capture the issues and mitigation for Segments 8 and 9.

The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Federal, State, and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed action that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency.

All comment submittals must include the commenter's name and street address. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that

your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. The minutes and list of attendees for each scoping meeting will be available to the public and open for 30 days after the meeting to any participant who wishes to clarify the views he or she expressed.

Any persons wishing to be added to a mailing list of interested parties can call or write to BLM, as described in this notice. Additional information meetings may be conducted throughout the process to keep the public informed of the progress of the supplemental EIS.

**Authority:** 40 CFR 1501.7 and 43 CFR 1610.2.

**Timothy M. Murphy,**  
*BLM Idaho State Director.*

[FR Doc. 2014–22408 Filed 9–18–14; 8:45 am]

**BILLING CODE 4310–GG–P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[LLCOS00000 L12200000.DF0000 14X]

#### Notice of Public Meetings, Southwest Colorado Resource Advisory Council

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of public meeting.

**SUMMARY:** In accordance with the Federal Land Policy and Management Act and the Federal Advisory Committee Act of 1972, the U.S. Department of the Interior, Bureau of Land Management (BLM) Southwest Colorado Resource Advisory Council (RAC) is scheduled to meet as indicated below.

**DATES:** The Southwest Colorado RAC meeting will be held on November 7, 2014, in Montrose, Colorado.

**ADDRESSES:** The Southwest Colorado RAC meetings will be held November 7, 2014, at the Montrose Public Lands Center, 2465 S. Townsend Ave., Montrose, CO 81401. The meetings will begin at 9 a.m. and adjourn at approximately 4 p.m. A public comment period regarding matters on the agenda will be held at 11:30 a.m.

**FOR FURTHER INFORMATION CONTACT:** Lori Armstrong, BLM Southwest District Manager, 970–240–5300; or Shannon Borders, Public Affairs Specialist, 970–240–5300; 2505 S. Townsend Ave., Montrose, CO 81401. Persons who use a telecommunications device for the

deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

**SUPPLEMENTARY INFORMATION:** The Southwest Colorado RAC advises the Secretary of the Interior, through the BLM, on a variety of public land issues in Colorado. Topics of discussion for all Southwest Colorado RAC meetings may include field manager and working group reports, recreation, fire management, land use planning, invasive species management, energy and minerals management, travel management, wilderness, land exchange proposals, cultural resource management and other issues as appropriate.

These meetings are open to the public. The public may present written comments to the RACs. Each formal RAC meeting will also have time, as identified above, allocated for hearing public comments. Depending on the number of people wishing to comment and time available, the time for individual oral comments may be limited.

**Ruth Welch,**  
*BLM Colorado State Director.*

[FR Doc. 2014–22356 Filed 9–18–14; 8:45 am]

**BILLING CODE 4310–JB–P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Ocean Energy Management

[MMAA 104000]

#### Outer Continental Shelf (OCS), Gulf of Mexico (GOM), Oil and Gas Lease Sales, Central Planning Area (CPA) Lease Sales 235, 241, and 247

**AGENCY:** Bureau of Ocean Energy Management (BOEM), Interior.

**ACTION:** Notice of Availability (NOA) of the Final Supplemental Environmental Impact Statement (EIS).

**Authority:** This NOA is published pursuant to the regulations (40 CFR part 1503) implementing the provisions of the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. 4321 *et seq.*).

**SUMMARY:** BOEM has prepared a Final Supplemental EIS for proposed OCS oil and gas Lease Sales 235, 241, and 247, which are tentatively scheduled to be held in March 2015, 2016, and 2017, respectively, in the Gulf of Mexico CPA offshore the States of Louisiana,

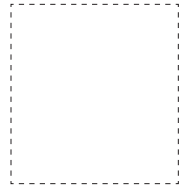
## **Appendix C-2 News Releases**



## Gateway West Transmission Line Project

950 W. Bannock Street, Suite 800  
Boise, ID 83702

RETURN SERVICE REQUESTED

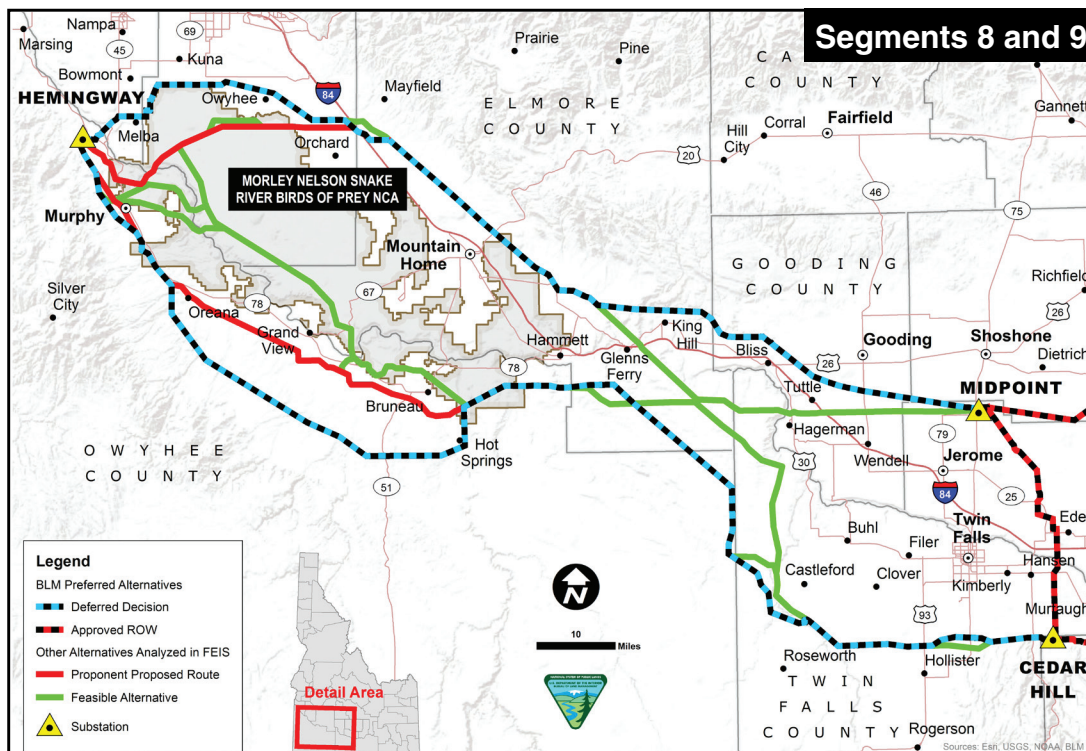


### Gateway West project update on Segments 8 and 9 in Idaho

## For more information

- Go online to [www.wy.blm.gov/nepa/cfodocs/gateway\\_west](http://www.wy.blm.gov/nepa/cfodocs/gateway_west).
- Boise District RAC Website:  
[www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.html](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html).
- Email [Gateway\\_West\\_WYMail@blm.gov](mailto:Gateway_West_WYMail@blm.gov).
- Call 1-800-380-5828.
- Write to the Bureau of Land Management.  
Gateway West Project  
P.O. Box 20879  
Cheyenne, WY 82003

## Gateway West Transmission Line Project



Segments 8 and 9 in Idaho as shown in the project Record of Decision (ROD). The BLM continues to evaluate routes in this area.

**See inside  
for more  
information.**

# Gateway West Transmission Line Project

## Project Update – Segments 8 and 9 in Idaho

The Bureau of Land Management (BLM) released the Record of Decision (ROD) for the Gateway West Transmission Line Project on November 14, 2013. The ROD, prepared under the National Environmental Policy Act (NEPA), identifies the BLM's decision on routing for the project. The Gateway West Transmission Line Project, jointly proposed by Rocky Mountain Power and Idaho Power, is composed of 10 transmission line segments, originating at the Windstar Substation near Glenrock, Wyoming, and terminating at the Hemingway Substation 20 miles southwest of Boise, Idaho.



### Next steps for the BLM

Beginning in December 2013, a subcommittee of the Boise District RAC has been evaluating siting issues associated with segments 8 and 9 in and around the Morley Nelson Snake River Birds of Prey National Conservation Area, as well as on private lands. The subcommittee will prepare a report for the Boise District RAC, which will then present routing options for segments 8 and 9 for the BLM to consider. The subcommittee meetings will continue as needed and are open to the public. Meeting information will be posted on the Boise District RAC website, or you may contact the project team to receive meeting date information.

### What is a Resource Advisory Committee (RAC)?

RACs provide advice to the BLM on the management of public lands and resources.

The Boise District RAC is a citizen-based group consisting of 15 members from interests in local communities, including ranchers, environmental groups, tribes, State and local government officials, academics, and other public land users.

The BLM Authorized Officer for segments 8 and 9 will review the findings of the Boise District RAC. If additional routing options are to be considered that would require changes to the alternatives presented in the final EIS, the BLM will prepare additional environmental analysis for public review and comment. If additional environmental analysis occurs, the BLM will invite the public to participate and comment on issues, potential impacts, mitigation measures, and alternatives to segments 8 and 9.



## BLM begins scoping for segments 8 and 9 in southwestern Idaho

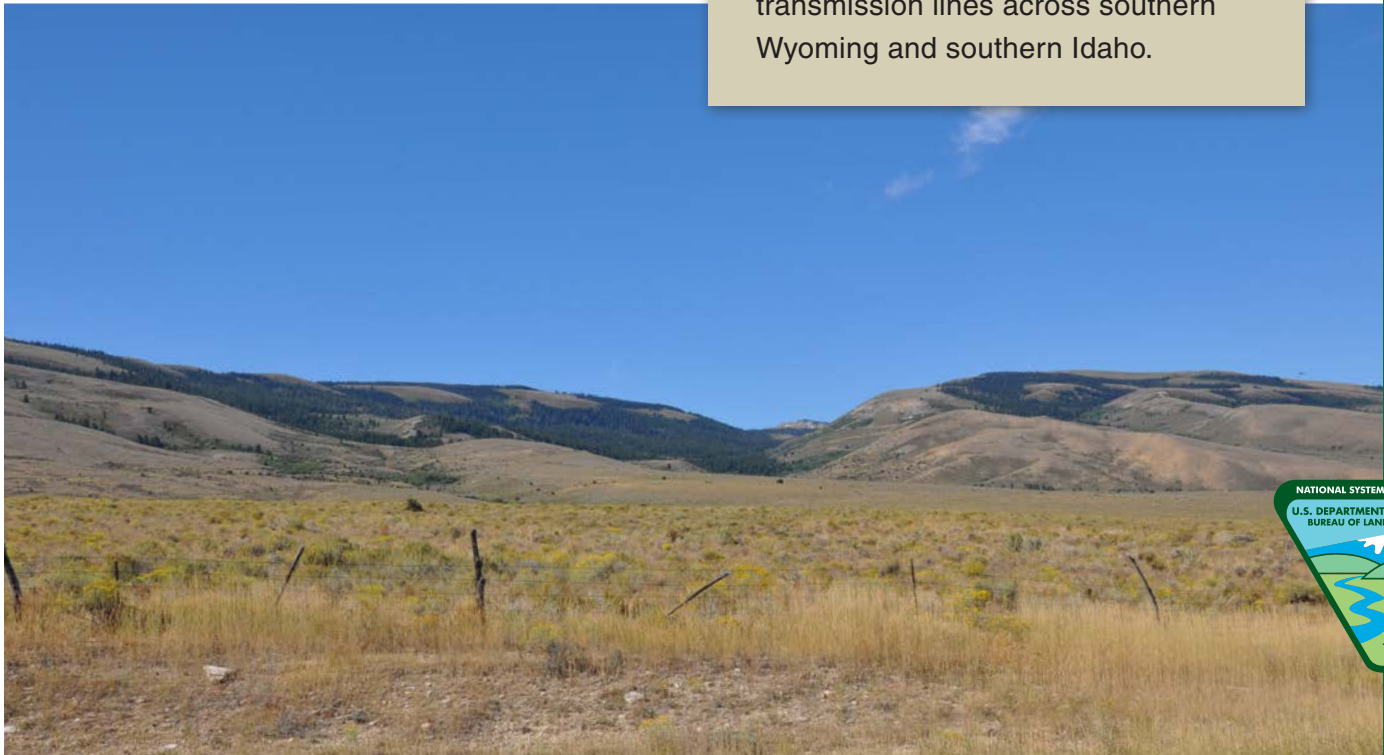
The Bureau of Land Management (BLM) will conduct additional environmental review of segments 8 and 9 of the Gateway West Transmission Line Project in southwestern Idaho. The BLM released a Record of Decision (ROD) for other segments of the project in Wyoming and eastern Idaho (1 through 7 and 10) in November 2013, but deferred a decision on segments 8 and 9 to allow for further discussion of routing alternatives for these segments and additional coordination focusing on conservation and enhancement of resources in the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).

**See inside for more information about public scoping meetings, the supplemental EIS, and next steps.**

Discussions led by the BLM Boise District Resource Advisory Council (RAC) resulted in new route options for segments 8 and 9 and proposed mitigation and enhancement measures for resources in the NCA. This is substantial new information that has not been previously analyzed, and the BLM has determined that a supplemental EIS analyzing this new information is needed to support a decision on authorizing these two segments.

### About the project

The Gateway West Transmission Line Project is jointly proposed by Rocky Mountain Power and Idaho Power to build, operate, and maintain approximately 1,000 miles of new 230 kilovolt (kV) and 500 kV electric transmission lines across southern Wyoming and southern Idaho.





## Segments 8 and 9 update

On August 8, 2014, the proponents submitted a revised application for segments 8 and 9, which incorporates some routing options evaluated by the RAC. The proponents also formally submitted the Proposed MEP as part of the updated plan of development for segments 8 and 9.

### NEPA process for segments 8 and 9

EISs are prepared under the National Environmental Policy Act (NEPA) to identify and disclose the environmental impacts from federal actions that may significantly affect the human and natural environment. An EIS offers citizens the opportunity to learn about and be involved in the federal decision-making process for projects like Gateway West. A supplemental EIS builds on information and analysis presented in an earlier final EIS.

The NEPA process is complete for segments 1 – 7 and 10 in Wyoming and eastern Idaho, and a decision has been issued for these segments.

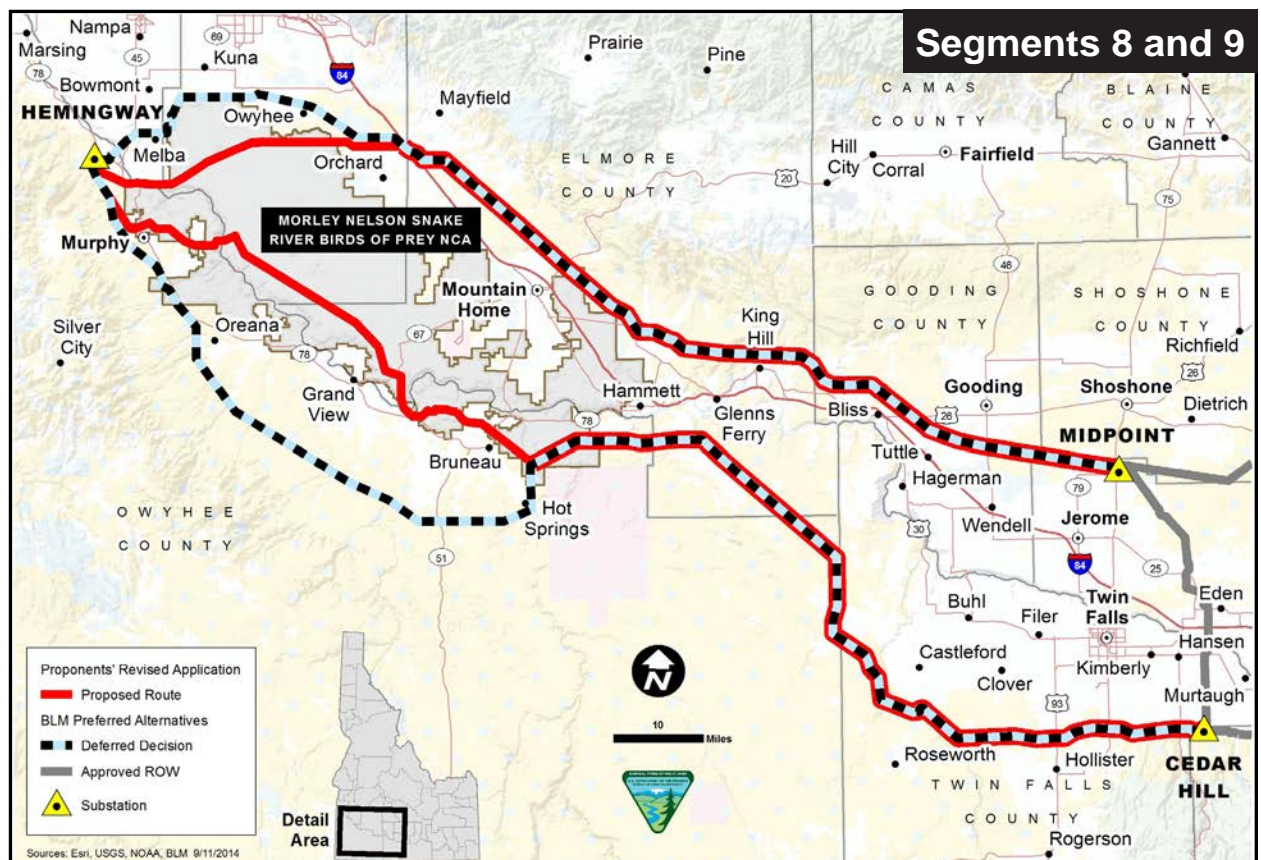
New proposed routes and final EIS BLM preferred routes for segments 8 and 9 in southwestern Idaho. The BLM will evaluate routes in this area in a supplemental EIS.

### Scoping for segments 8 and 9

The supplemental EIS for segments 8 and 9 will begin with scoping to gather public input on issues to be analyzed in the supplemental EIS. The supplemental EIS will consider information that was not available when the final EIS was developed and additional, relevant information gathered during scoping. Information on segments 8 and 9 from the final EIS, including route analysis, will be carried forward into the supplemental EIS. Authorizing routes for segments 8 and 9 on public lands may require amendments to one or more BLM land use plans.

Some of the new information already available involves:

- Changes in the regulations on the required distance separating parallel transmission lines: the Western Electric Coordinating Council now allows closer distances (a minimum of 250 feet).
- Revisions to the proponents' proposed routes for segments 8 and 9, including double-circuiting of power lines in some areas and adjusted proposed alignments based on information developed by the RAC.
- Proponents formally submitting the MEP, which includes measures proposed to meet statutory requirements for enhancing resources in the NCA.



The BLM published a Notice of Intent (NOI), which initiated the scoping period for the supplemental EIS. During scoping, the BLM invites comments on issues, potential impacts, mitigation measures, and alternatives associated with granting rights-of-way on public lands for segments 8 and 9 that were not addressed in the final EIS.

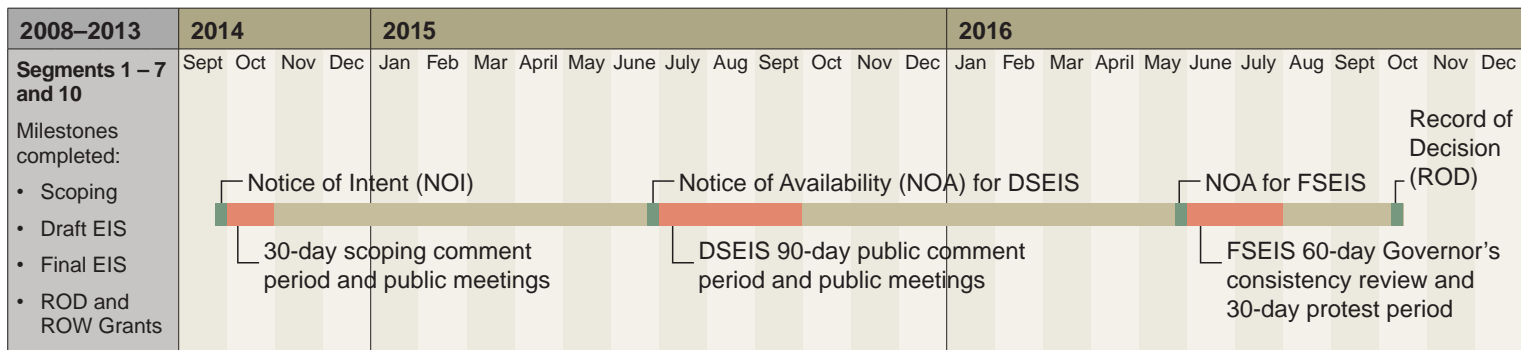
At present, the BLM has identified the following issues and concerns, which will be addressed in the supplemental EIS:

- Effects to the objects and values for which the NCA was designated
- Land use conflicts and inconsistency with existing land use plans
- Effects of the project on local and regional socioeconomic conditions
- Effects on wildlife habitat, plants and animals, including threatened, endangered and sensitive species
- Effects to visual resources and existing viewsheds
- Effects to historic and cultural resources
- Effects to Indian trust assets
- Effects to State and private lands, and local government interests

## Calendar of public open houses

The BLM will host a series of public open houses in the areas of segments 8 and 9 to take public scoping comments and provide information on the project and the next steps. You may stop by an open house anytime during the times listed to the right. There will be no formal presentation during the open houses.

## Schedule



## How to provide scoping comments

The BLM encourages comments on the proponents' new proposed routes for segments 8 and 9, routes previously analyzed in the final EIS, feasible alternative locations, possible mitigation and enhancement measures, and any other information relevant to the proposed action. You may submit comments in writing to the BLM at any public scoping meeting or using one of these methods:

**Submit comments online at** [http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.htm](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.htm)

**Email** [blm\\_id\\_gateway\\_west@blm.gov](mailto:blm_id_gateway_west@blm.gov)

### Send written comments to:

Bureau of Land Management, Gateway West Project  
1387 S. Vinnell Way, Boise, ID 83709

**Attend a public scoping open house** (see calendar)

**Scoping comments should be submitted or postmarked by October 24, 2014.**

*BLM Idaho State Office will lead the supplemental EIS process for segments 8 and 9. All comments and questions related to segments 1 through 7 and segment 10 should be directed to the BLM Wyoming State Office at Gateway\_West\_WYMail@blm.gov or Bureau of Land Management, Gateway West Project, P.O. Box 20879, Cheyenne, WY 82003.*

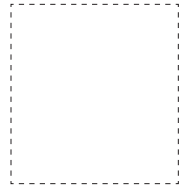
Meeting Date	Time	Location
Tuesday, October 7	10 a.m. – 1 p.m.	BLM Boise District Office 3948 Development Ave., Boise, ID
Tuesday, October 7	4 p.m. – 7 p.m.	Kuna Senior Center 229 N. Ave. B, Kuna, ID
Wednesday, October 8	4 p.m. – 7 p.m.	Gooding Fairgrounds 201 Lucy Ln., Gooding, ID
Thursday, October 9	4 p.m. – 7 p.m.	Owyhee County Historical Museum 17085 Basey St., Murphy, ID



## Gateway West Transmission Line Project

950 W. Bannock Street, Suite 800  
Boise, ID 83702

RETURN SERVICE REQUESTED



### BLM begins scoping for supplemental EIS for segments 8 and 9 in western Idaho

## Gateway West Transmission Line Project

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The Bureau of Land Management (BLM) has begun scoping for segments 8 and 9 for a supplemental environmental impact statement. Look inside for information about:

- Project update
- Scoping public meetings and comment period
- Project status and next steps in the NEPA process



### For more information

- Go online to [http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.htm](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.htm).
- Email [blm\\_id\\_gateway\\_west@blm.gov](mailto:blm_id_gateway_west@blm.gov).
- Call our information line for up-to-date information at 1-800-380-5828.

## **Appendix C-3 Scoping Meeting Handout**

# Gateway West Transmission Line Project

## Supplemental Environmental Impact Statement

### Why Are We Here?

October 2014

Rocky Mountain Power and Idaho Power have proposed building and operating approximately 1,000 miles of new high-voltage transmission lines across Wyoming and Idaho. Because portions of these lines would cross public land managed by the BLM and other agencies, the companies submitted an application for a right-of-way (ROW) grant across Federal lands in May of 2007. The BLM granted ROWs for segments 1 through 7 and 10 in 2013 but deferred a decision on segments 8 and 9 to allow additional time for Federal, State and local agencies to work together on identifying routes for these segments and on mitigation and enhancement measures for resources in the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).

The companies have revised their application and identified a new proposed route for both segment 8 and segment 9. They have also proposed a package of mitigation and enhancement measures for impacts to resources and values in the NCA, in the event that any portions of segments 8 or 9 are sited there. The revised application and the proposed Mitigation and Enhancement portfolio (MEP) represent substantial new information that has not been analyzed under the National Environmental Policy Act (NEPA).

The BLM has determined that a supplemental EIS is needed to analyze this new information for segments 8 and 9 and to reach a decision whether to authorize and site segments 8 and 9 on Federal lands. No additional analysis is needed for segments 1 through 7 and 10.

### PROJECT MILESTONES

#### 2007

Initial ROW application

#### 2008

##### May – July

Scoping for original 10-segment project

#### 2011

##### July

Draft EIS published

#### 2013

##### April

Final EIS published

##### November

Decision for segments 1-7 and 10

##### December

Boise RAC subcommittee convened

#### 2014

##### May 30

RAC reports

##### August 8

Companies submit revised ROW application and Plan of Development

##### September 19 – October 24

Scoping for supplemental EIS for segments 8 and 9

#### 2015 (estimated)

##### June

Publish Draft Supplemental EIS for segments 8 and 9

##### September

Public comment on Draft Supplemental EIS closes

#### 2016 (estimated)

##### May

Publish Final Supplemental EIS for segments 8 and 9

##### June

Protest period closes

##### October

Record of Decision for segments 8 and 9



While the revised application and the MEP focus on the area in and near the NCA, the BLM has not made a decision on any portion of segment 8 or 9. The BLM is asking you to review and comment on the revised proposed routes, along with route alternatives considered by the Boise District Resource Advisory Council (RAC), and all routes considered in the original EIS. Additional route options may be identified through the scoping process. Information about all previously proposed routes for segments 8 and 9 is available at today's meeting and online at [http://www.blm.gov/id/st/en/prog/nepa\\_register/gateway-west.html](http://www.blm.gov/id/st/en/prog/nepa_register/gateway-west.html).

The BLM will use information gathered during scoping to determine which routes to analyze in the supplemental EIS. The supplemental EIS will inform the BLM Idaho State Director's decision on whether or not to grant a right-of-way across Federal land, and, if a right-of-way is granted, what routes would be authorized and what enhancement and additional mitigation measures would be required for any portion of an authorized route that crosses the NCA.

Scoping began on September 19, 2014, and will close on October 24, 2014. Your comments will be most helpful if they are submitted during this period. There is a station at today's meeting where you can submit comments. You may also mail or email your comment to the one of the addresses listed at right, or submit your comments on the project Web site listed above.

## How Best To Comment

The most helpful comments will:

- Provide new information pertaining to segments 8 and 9, including the proposed MEP;
- Identify new issues that should be considered;
- Identify a different way to meet the underlying need;
- Point out a specific flaw in the companies' proposal, in the information developed by the RAC, or in past NEPA analysis;
- Suggest methodologies that should be used in the NEPA analysis, including reasons why; and/or
- Identify a different source of credible research that should be used in the NEPA analysis.

**Project information line:** toll-free | 1-800-380-5828

**eMail:** [blm\\_id\\_gateway\\_west@blm.gov](mailto:blm_id_gateway_west@blm.gov)

### Mail, Courier or Hand Delivery:

Bureau of Land Management  
Idaho State Office  
Gateway West Transmission Project  
1387 S. Vinnell Way  
Boise, ID, 83709

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*Privacy Note: Comments, including names and addresses of respondents, will be made available to the public after the close of the official comment period. Please be advised that your entire comment, including your personal identifying information, may be made publicly available at any time. Although you may ask the BLM in your comment to withhold your personal identifying information from the public, we cannot guarantee that we will be able to do so. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.*

